



Pre-production Brief  
Consultation results



## 1.1. Introduction

1.2 At the beginning of March 2007 North Somerset Council published a Pre-Production Brief for the first of its Local Development Framework (LDF) documents –The Core Strategy. This document set out the timetable, resources required, evidence needed to make decisions and an indication of the key challenges the Core Strategy needs to face. Details of the document were sent to all Councillors, Town and Parish Councils, adjacent authorities, central and regional Government and development agencies, numerous specific consultation bodies and various persons and organisations who had previously registered an interest in the Core Strategy. A total of 27 individuals and organisations responded. These are listed in Appendix 1. The main findings are summarised below together with an officer response.

### 2.1 Should Development Control Policies be included in the Core Strategy?

2.2 Six respondents thought they should be included whilst eight thought they should not. The rest did not respond, stated they did not know or had no opinion.

2.3 Reasons for including them included; the fact that they had recently been scrutinised at the Replacement Local Plan Inquiry; that by including them it provided the opportunity to reconsider the airport situation (BIA); that it would provide the clear focus on how the policies will develop the spatial vision; would provide a more robust clear and up to date spatial policy framework; that they should be included as an Appendix and subject to review; that ones with District wide implications should be included; and that it would be useful to have them in one document.

2.4 Reasons for not including them included, the fact that they are too specialised and should not be in a Core Strategy which is a broader document. Several respondents cited possible delay and the knock on effects for other DPD's. GOSW were firmly of the opinion that they should not be included since if they needed re-examination then the whole Core Strategy will need to go through the process again. Other comments included, a dedicated DC DPD will be required at some stage but this should not prevent some workable reference to active DC policies in the meantime. Development Control Policies could help to inform the Core Strategy but should not determine it. As Policies already exist in the Local Plan how they are integrated is most important. A statement about the priority of Core Strategy over local plan policies would be needed.

2.5 Comment. Whilst accepting that the Development Control policies have recently been through the scrutiny of a Public Local Inquiry many respondents felt that the Core Strategy was a higher order document which could be delayed by including them. To include them would not simply be a case of lifting and inserting as an



appendix. The policies would be subject to renewed scrutiny in the light of the Core Strategy Policy and longer time horizon. To merge the two would, as GOSW point out, require a repetition of the entire process should any change to DC policy be required. This defeats the purpose of having a series of DPD's making up the LDF. In conclusion it would seem more practical to produce a separate DPD for the main DC policies later in the process with only strategic policies in the Core Strategy.

### **3.1 Is the timetable realistic?**

- 3.2 Five respondents believed the timescale was not realistic whilst eight thought it was. Comments focussed on ensuring adequate provision was made for the minimum six week consultation periods with greater time over holiday periods. Suggestion was made that all households be notified by letter. Some comments related to the fact the timetable would depend on adequate budget and resource allocation. Other comments related to other DPD's particularly the Weston and SW Bristol AAP's and the need to ensure these ran in parallel with the Core Strategy and with the Bristol LDF. The timing to include the EIP panel report findings before issuing preferred options was welcomed. One suggestion for speeding up the process included condensing the document preparation time. GOSW questioned the need to consult on this as the timetable was about to be formally agreed.
- 3.3 Comment Clearly there is some difference of opinion between those who wish to speed up the process and those who are concerned about adequate time for consultation. GOSW have not raised objections to the timetable and on balance it would appear that the timetable seems fairly realistic.

### **4.1 Are there other interest groups/organisations which should be included in the process?**

- 4.2 Numerous suggestions were made in response to this question. Organisations details which are not already included in our database will be added.

### **5.1 Are the topic papers correctly identified?**

The main issues identified in this section were as follows. Firstly, the inclusion of role of the green Belt in the settlement function and hierarchy paper was questioned as it was felt this work was carried out as part of the RSS. Issues relating to the airport were raised although these mainly related to the evidence base see below. The need for a separate topic paper on climate change was raised as was the need to identify issues faced by villages. The separation of retail issues from leisure tourism and culture was welcomed.

- 5.2 Comment The RSS identifies various changes to the Green Belt boundary within the North Somerset area notably to accommodate the urban extension to SW Bristol, and to include land SW of Nailsea and SE of Clevedon. The Core strategy process will need to identify various options for the outer boundary and needs to consider



how to treat those settlements which will be within the green belt i.e. inset or washed over. Similarly it would be appropriate in examining the settlement hierarchy and locational strategy to consider how Green Belt policies have influenced the form and function of settlements and whether the current list of inset and washed over settlements is appropriate and whether settlement boundaries are appropriate and necessary for many green belt settlements.

- 5.3 Climate change is a major issue facing us over the plan period and although it is included within the natural environment Topic Paper, measures to mitigate the impacts and adapt to the changes will be cross cutting. Although clearly an overriding issue it has not been allocated a single topic paper mainly as much of the evidence is not specific to North Somerset and the topic paper could end up repeating information used for the RSS.
- 5.4 The need to include issues facing the villages was commented on. This in part will be raised in the settlement function and hierarchy paper but it is accepted that specific rural issues in particular will need to be identified and addressed.

#### **6.1 Other sources of information**

- 6.2 Many respondents provided details of specific reports, studies and information which may be useful in understanding the issues. These are listed in Appendix 2. Of particular concern however was the listing of some studies, which respondents argued, had been carried out for commercial operators and had not been subject to public scrutiny (these mainly related to issues at the airport) in these cases the respondents requested some form of critical review of this evidence.

#### **6.3 Comment**

The additional information listed in Appendix 1 is noted. However, some of this information is no more independent than studies commissioned for commercial operators. All evidence will be open to evaluation through the DPD preparation process.

#### **7.1 Gaps in the evidence**

- 7.2 Again replies focused mainly on the airport and need for up to date economic impact of the airport and tourist deficit. Although it was also recognised that work was required on the effects of the urban extension on the landscape and communities to the SW of Bristol. A new Landscape character assessment was also cited. It was also pointed out that gaps may not be obvious at this stage but that the process should allow new studies to be added later.



## 8.1 Suggested changes to the challenges and additional key issues

8.2 Listed below are the main comments made in relation to the challenges and other key issues.

### 8.3 Relationship with RSS/other DPD's etc.

- Concern about approach to the Green Belt as subject to objections and RSS not approved.
- RSS is being given priority when it is still draft.
- RSS and RLP already established clear locational strategy therefore no role for the CS in testing options or defining preferred option. No role for the CS in testing delivery of urban extensions as this has already been decided in RSS.
- Regarding identifying critical key infrastructure RSS has set the strategic framework therefore difficult to see a role for the Core Strategy.
- As the RSS and the RLP set the Strategic framework difficult to see role for the CS. No task for the CS at SW Bristol the detail to be decided in an AAP. Suggest the Council put out a position statement regarding locational strategy allowing the SW Bristol AAP to be accelerated also need an efficient and effective delivery mechanism set up to bring forward timely delivery of infrastructure.
- Insufficient account taken of forecasting more than 5-10 years ahead need more moderate staging and review.
- LDS timescales are out of line with the RSS. N Somerset must engage with neighbouring Authorities and Stakeholders. Core Strategy should be produced alongside AAP's for SW Bristol and WSM. Alternatively North Somerset should include site allocations for the large strategic sites in the Core Strategy.

### 8.4 Comment:

The RSS provides the higher level context for preparing the CS. Any changes between the draft and final versions of RSS will be taken into account as the CS moves through its statutory stages. Disagree that CS has no role in elaborating the RSS. CS is district-wide and will supersede/roll forward the RLP locational strategy. Other DPDs will provide site-specific detail as set out in the LDS.

### 8.5 Urban Extensions and settlement structure

- Object to the phasing of the urban extensions.
- Clarification is required on what is meant by phasing of urban extensions as RSS requires delivery ASAP no question of priority between extensions in the Core Strategy.
- Suggested rewording 'Identify and phase the extent and broad locations for possible urban extensions at WSM and Ashton Vale in relation to housing supply targets subject to the provision of employment opportunities and related sustainable housing development.'



- Core Strategy must contain appropriate strategy for the continued evolution and regeneration of WSM. Should be clear regarding the role and function of the town, support the work of the AAP and acknowledge the contribution mixed use and other development can make. Mixed use development led growth is an appropriate growth strategy for WSM. Self containment will not be secured by a restriction of house building. Need for a positive policy framework.
- Object to the perpetuation of the restriction of further housing at WSM. Sustainable comprehensive mixed use communities need to be brought forward. Key challenge is the continued economic regeneration and diversification of WSM in the context of a step change in housing delivery.
- 'Ashton Vale' or some other N Somerset descriptive term should be used instead of SW Bristol.
- Suggested rewording 'Support the regeneration of WSM without compromising the vitality and sustainability of the remainder of the District.'
- There is an over emphasis on WSM. The sustainability of the rest of the District should not be a lesser priority than the regeneration of WSM. Core Strategy needs to address the role of Nailsea, Clevedon and Portishead.
- The 'improve the sustainability of the rest of the District..' provides too much focus on WSM and needs to make provision for SW Bristol extension.
- Emphasis on WSM could undermine improving sustainability at the rest of North Somerset. Suggest 'Secure the regeneration of WSM whilst improving the sustainability of the rest of the District.' The regeneration of WSM should not be at the expense of vital services in settlement in or close to the AONB.
- Include open space and sustainable transport in the growth and function of Settlements.
- Use this opportunity to fully review the Nailsea inset/inner boundary as a whole with a view of partially rolling back the boundary to allow for future development at the most appropriate and sustainable locations.
- Given that the adopted Local Plan heavily weighted housing targets towards Clevedon and Portishead, with only limited provision going to Nailsea, it is important that this imbalance is redressed in the Core Strategy.
- Addressing the historical imbalance between housing and employment in Portishead Nailsea and Clevedon.

8.6 Comment: Emphasis on the urban extensions reflects the importance of the strategically significant cities and towns to sustainable development in the region. Other areas are expected to stabilise around a more local role, which the CS will articulate. Housing-led growth at WsM is not appropriate as this has previously resulted in poor self-containment. Suggest 'Yanley' as name for SW Bristol urban extension.



### 8.7 Transport

- Aviation expansion should not be included if the area is to transform from a high carbon to low carbon economy.
- Growth at BIA should not be positively encouraged and reference to BIA deleted from the Strategy
- The BIA challenge does not need to be qualified by environmental acceptability. Should read 'Accommodate Growth at BIA in line with Government Policy set out in the Future of Air Transport White Paper.' This covers the environment impact of aviation.
- A key issue is the integration of the transport system, including public and private travel.
- Need to ensure the Core strategy will take into account the impact of development on the M5 particularly junction 21. Also closer integration of transport and land use planning.
- New road building should not be supported unless vital for health and safety reasons.
- Add objective to support radically improved rail services.
- Reiterate concern regarding large allocations in Bristol, Bath and WSM and potential increase in commuter trips between the areas. Concern re congestion at J15 & J21. Needs to address the imbalance between residential development and employment. Support provision high quality public transport schemes. Detailed testing on RSS scenarios still to be carried out.

8.8 Comment: Reducing the homes/jobs imbalance and the need for improved transport infrastructure to accommodate growth will be important considerations, although they may be difficult to reconcile. CS approach to aviation will have regard to national and regional policy.

### 8.9 Climate change, biodiversity, countryside, Green Belt

- It was suggested that biodiversity and adapting to climate change were not included, - comment these are covered in the general development principles and distinctiveness sections.
- Replacement provision of Green Belt in Wrington for that lost to the Airport.
- Explanation of Green Infrastructure required.
- Another challenge is to maintain and enhance biodiversity of habitat and species in N Somerset. Assessing impact of urban extensions in local context particular attention to foraging areas and flight lines of protected species as well as the Severn estuary and the issue of coastal squeeze. Green Infrastructure must be incorporated into design and development proposals and distinguished from allocated conservation areas.
- Under distinctiveness the challenge does not go far enough should read ' Ensure our environmental assets are adequately protected and enhanced'. and ensure appropriate safeguards are included if an assessment reveals shortfalls in terms of protection.



- Need consistent approach to the Green Belt throughout West of England area should follow the South Gloucestershire example of a review in Core Strategy and detailed Master Plan done in parallel. Approach to settlements inset from Green Belt should be clear. Nailsea and Backwell should be excluded from the GB and further land for their expansion should also be excluded.
- A key issue must be how to achieve sustainable economic growth within environmental limits. With particular reference to transport issues, such as road construction and expansion of Bristol International Airport. It is important that irreplaceable biodiversity assets, such as ancient woodland, are protected and enhanced.
- Natural environment seems overlooked. Needs reference for the 'Components of a Sustainable Community'

8.10 Comment: Natural environment will be fully considered in the context of options for development. Approach to Green Belt will reflect RSS, which sets general extent.

### 8.11 Housing

- Core Strategy should also ensure that the self-generating housing needs of settlements are met.
- Growing need for affordable housing and increasing elderly population. Specialised housing for the elderly is in short supply. Specific policies to meet this need should be in the Core Strategy.
- Include reference to affordable housing in General development principles.
- Provision of affordable housing and rural affordable housing.
- Need to address Affordable housing provision particularly at the larger rural settlements. List settlements where affordable homes need real focus. Put in place policy which indicated that such affordable housing sites will be allocated in site specific documents.

8.12 Comment: Affordable housing will be an important consideration, as part of a spatial distribution of new housing, by scale and type, that reflects sustainable development principles.

### 8.13 Health and wellbeing

- Health, wellbeing and quality of life should surely be the ultimate aim.
- Suggested rewording 'Ensure the Plan enables people to have healthier and safer lifestyles within a rich and sustainable natural environmental framework that is as diverse and at least of the quality we enjoy today.'
- Rather than looking in the future to increased breakdown of family units and second home sensible to consider other scenarios- a large increase in single person households unlikely to lead to much quality of life.
- Addressing the specific needs of the increasing elderly population.

8.14 Comment: Improved quality of life is an important consideration, though CS cannot determine lifestyle choices, some of which are a product of increased prosperity.





#### 8.15 Economy

- Assumptions are made about business growth at Portbury Dock and Bristol International Airport before this is tested.
- An additional topic should read ensuring the future economic growth/prosperity of the area.
- Implications of continued net in-migration and desire to maintain adequate labour supply.

8.16 Comment: CS approach to major infrastructure will have regard to national and regional policy. CS will promote sustainable economic development, compatible with other aims.

#### 8.17 Rural issues

- Suggested rewording 'Meet village/parish specific needs in the rural areas without unacceptably increasing urbanisation.'
- Approach is too urban. North Somerset's landscape features and natural environment should be more overtly recognised and related issues considered.
- Rural areas have a very low profile. Under General Development Principles need to add 'Protecting the countryside from inappropriate development.'  
Need for a definition of Green Infrastructure

8.18 Comment: Emphasis on the urban extensions reflects the importance of the strategically significant cities and towns to sustainable development in the region. Other areas are expected to stabilise around a more local role, which the CS will articulate. Natural environment will be fully considered in the context of options for development. Urban focus will in itself help to protect the rural areas from inappropriate development.

#### 8.19 Other Comments

- Core Strategy should identify a hierarchy of centres within N Somerset and provide an explanation as to the requirements for retail floor space in the light of up to date need assessment.
- Importance of Community Safety - 'Safer Places' Importance of safety and security in relation to crime and prevention of crime.
- Reference to' provision should be made for sufficient capacity to be provided to manage the waste generated locally'.
- Suggest Developer contributions for the infrastructure of community and cultural facilities should be identified in the Core Strategy
- Retail policies should be criteria based. A sequential approach applied in the selection of sites for retail allocations.
- Core strategy should allow some flexibility in policy to allow non-traditional employment uses to occupy employment sites.



- Policies on Renewable energy should avoid placing onerous requirements on developers where target are not practical or viable.
- Flooding- one of the key issues likely to face N-Somerset over the Plan period.

8.20 Comment: Expectations placed on developers will have regard to national and regional policy, while also ensuring that development contributes to the creation of sustainable communities. CS will consider retailing and the role of town centres.

### 9.1 Addition comments

- Welcome principle of setting out the process but guard against duplication of information held elsewhere eg LDS.
- Reference to the Planning system being 'new' no longer appropriate.
- Evidence base should be kept under review with the latest information.
- Existing policies should not be carried forward but be subject to critical review.
- Well drafted document but more account could be taken of local views.
- Concern that the 6 week period for consultation not followed for the Pre-production Brief. Needs time for Feed Back on consultation.
- Concern about NSC's ability to adequately assess consultation responses seems that increased resources will be essential
- NSC should adhere to the SCI on consultation at all times should leaflet all households on major issues and results published.
- Questioned the 'population growing in affluence' and integration with the Community Strategy.

9.2 Comment: CS will be prepared in line with national policy and SCI. Resource availability highlights the need to achieve value for money at all stages. It is recognised that average measures such as affluence can obscure pockets of multiple deprivation.

### 10.0 On-line consultation

10.1 North Somerset Council would like to thank all respondents for their comments. Many of the issues raised will continue to be discussed as the Core Strategy proceeds through its process. In particular we would like to thank those of you who used and tested the on-line consultation process. This worked well and it is hoped to expand its use in future consultations.



**Appendix 1** List of Respondents

|     |       |           |   |
|-----|-------|-----------|---|
| Mrs | H R   | Burn      | Stop Bristol Airport Expansion Campaign             |
| Mr  | J A G | Milward   | Woodland Trust                                      |
| Mr  | J A G | Milward   |   |
| Mrs | G     | Jones     | Nathaniel Lichfield and Partners For Cavanna Homes  |
| Mrs | G J   | Bigg      | Campaign to Protect Rural England                   |
| Mr  | I     | Morrell   | Nailsea Town Council                                |
| Mrs | E E   | Wade      | Clevedon Town Council                               |
| Mr  | A J   | Bateman   | The Planning Bureau Limited                         |
| Mrs | J     | Ashman    | The Highways Agency                                 |
| Mrs | P     | Rendle    | Portishead and North Weston Town Council            |
| Mr  | D     | Jones     | Government Office for the South West                |
|     |       |           | Pegasus Planning Group for Persimmon Special        |
| Mr  | M     | Fox       | Projects  |
| Mr  | M     | Eagland   | Peacock and Smith for W M Morrison Supermarkets Plc |
| Mr  | ET    | Bradley   | For Barrow Gurney Parish Council                    |
| Ms  | R     | Freeman   | The Theatres Trust                                  |
| Mr  | T     | Yearsley  | Wrighton Parish Council                             |
| Ms  | C     | Mitcham   | Baker Associates for Ashton Park Ltd                |
| Mrs | H     | Burn      | Parish Councils Airport Association                 |
| Mrs | N     | Milton    | Cleeve Parish Council                               |
| Mr  | D     | Cramond   | DC Planning Ltd for Heron Land Developments         |
| Mr  | P     | Morris    | Avon and Somerset Police Nailsea                    |
| Mrs | S     | Walker    | Strategic Land Partnerships                         |
| Mrs | L     | Allday    | Kingston Seymore Parish Council                     |
| Mr  | J     | Richards  | Mendip Hills AONB Service                           |
| Mr  | A     | Davies    | Bristol International Airport                       |
| Mr  | G     | Gillespie | Natural England                                     |
| Ms  | A     | Baird     | Yatton Parish Council                               |



**Appendix 2** List of suggested further information

'The BIA Master Plan Critical Review' prepared by Parson Brinkerhoff Ltd  
The South West Regional Assembly Draft Strategic Sustainability Assessment  
'The Economic Impact of Bristol International Airport' by Prof John Whitelegg.  
Professor Whitelegg 2006-outbound tourist expenditure.  
Predict and Decide (Aviation, climate change and UK policy) by Sally Cairns and Carey Newson  
Review of BIA Master Plan 2006-2030 Climate Change Aspects, January 2007 by Parsons Brinckerhoff Limited.

North Somerset Traffic Model  
All PPG's PPS's especially PPS25  
The Stern Report on Climate change.  
Strategic Green Belt Review Buchanan.  
The Barker Review Dec 2006  
Evidence to EIP  
Local housing needs studies  
Various local organisations  
Evidence to the EIP including Evidence base for Urban Extensions and review of the Green Belt- Arups.  
Revised household projections.  
AMR 06  
Defra Waste Review.  
GOSW Planning Inspectorate Early experiences Examining Development Plan Documents.  
UWE or University of Bristol  
NSPCT  
Visitor monitoring, condition of dry stone walls and development proposals having a significant impact on the AONB. From AONB service  
BIA Master Plan  
Green Infrastructure GI Report to the Royal Commission on Environmental Pollution Dr David Goode 2006.  
Strategy for the Severn Estuary -Severn Estuary Partnership 2001. Severn Estuary- Advice on conservation objectives.  
Biodiversity by Design TCPA 2004  
Parish Plans Surveys.  
Greater Bristol Strategy Transport Study  
Designing sustainable Communities for people and biodiversity' English Nature 2005