North Somerset Local Plan 2038: Preferred Options Consultation (Reg 18)

Consultation Statement

Appendix 1: Summary of Responses to the Strategic Policies

August 2022

Contents

This appendix provides an overall summary of responses to the Strategic Policies to indicate the range of issues raised. Detailed responses from individuals or organisations can be viewed on the online consultation page either against each policy within the document or for each respondent.

Policy SP1: Sustainable Development

A total of 153 comments were received against this policy. 44% objections, 30% Support with amendments, 26% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Backwell is not a sustainable location. Railway station is inaccessible and railway embankment is a major obstacle. A370 is congested. Don't build on good agricultural land/Green Belt. Detrimental impact on schools, health care, public services. Flooding and air pollution. Not close to jobs. People will continue to use cars. Ecological impact. Village should not be lumped in with Nailsea. Urbanising Backwell is contrary to the stated aims. Proposals for Backwell fail to address the climate emergency, support renewable energy, deliver an appropriate mix and type of housing to meet local needs, protect and enhance green infrastructure and biodiversity, or minimise risk of flooding.
- Laudable principles, but not carried through to allocations.
- Plan lacks detail and transport and other infrastructure information to inform a substantive response. Need to ensure adequate infrastructure provision.
- Need a new road from Long Ashton bypass to M5 at Clevedon.
- Must apply a policy-off approach which prioritises sustainable patterns of development rather than protecting Green Belt and delivering development elsewhere. Need to apportion more growth to settlements near Bristol – such as Failand.
- Need to challenge the housing target.
- Yanley Lane is not a sustainable location – urban sprawl is one of the worst options for carbon emissions. Will be a car dependent location. Don't build on green spaces.
- Development at Nailsea is unsustainable because of the lack of employment and the proposals would generate significant commuting.
- Need target for standards set in terms of achieving zero carbon.
- Unclear how values set out in SA were assigned and weighted. Development in Backwell in relation to reducing car use was rated positively which makes no logical sense. TA states 84% travel by car to work, 3% bus, 2% train. Proposed crossing of railway is uncosted and undeliverable. Modal shift seems unlikely.
- Text should emphasise that zero carbon development is not a mandatory requirement. Changes to building regulations will provide significant improvements – it would be unsound and unjustified to place additional requirements.
- Climate change and biodiversity loss are twin crises which must be tackled together – the first bullet refers to climate change but not biodiversity.
- NPPF says larger scale developments should be set in a vision that looks at least 30 years – Yanley Lane.
- Appropriate to require comprehensive masterplanning on larger sites, notably where they are of a scale that would deliver significant infrastructure.
- Policy is not adequately supported by DM policies to explain how it will be delivered.
- Improved active travel and public transport access is not supported by recent cuts to services.

- Principles are incompatible with Banwell Bypass.
- Need greater emphasis on 20 minute communities.
- Land currently in food production should be highly valued.
- Peat land is an important carbon store and should not be negatively impacted.
- Create more jobs in Portishead so people don't have to commute.
- Need to develop the culture and entertainment industry.
- Need more emphasis on bio-sustainable developments to respect and enhance habitats for wildlife and supporting re-wilding.
- More wooden framed houses which lock up carbon.
- No requirement for health centre provision alongside new development – shortage of doctors and dentists.
- Prioritising active travel is great but should be deterring car use.
- Volume house building is far from sustainable.
- A number of bullet points are duplicated in DM policies and in some cases are not entirely consistent.

Reasons for support:

- Creation of 20 minute communities is supported, notably through larger mixed use development.
- Delivering sustainable development should be the top priority.
- Climate emergency is fundamental – must identify options which cause least damage to the environment.
- Sustainability applies to existing as well as new communities.
- Approach is consistent with NPPF.
- If a location cannot deliver on these requirements, it should not be considered.
- Need for full zero carbon.
- Requires developments to demonstrate how they deliver the mix and type of housing to meet local needs including affordable and specialist housing.

Suggested amendments:

- As a strategic policy, it should be more succinctly yet clearly linked to the non-strategic policies within the plan. Whilst it is noted that where appropriate development proposals should address the climate emergency, this would be better set within other related issues, such as supporting the zero carbon initiative and reducing the risk of flooding from development.
- The policy should be redrafted to be more focused as opposed to being a checklist. It should also refer back to a revised vision for the draft Local Plan with objectives that are measurable such as the delivery of new homes to meet objectively assessed needs within the plan period.
- In prioritising good design and placemaking, it is appropriate for policies (and those directly linked to allocations) to require comprehensive masterplanning on larger sites – notably where they are of a scale that would deliver significant infrastructure. It may therefore follow that a planning application across the whole allocation would expedite development. This would ensure that planned schemes are deliverable in their entirety – and wording should be included in the policy to that effect.
- Policy should be deleted to avoid unnecessary duplication with NPPF.

- Amend seventh bullet: 'Deliver the mix and type of housing to meet the full objectively assessed needs including affordable and specialist needs housing'.
- Add bullet point 'address issues of land instability and contamination'.
- Policy could make it clear the requirement for development to minimise use of mains water, incorporate water saving measures and equipment and ensure a resilient water supply system.
- Last objective should be expanded to refer to the need for sustainable water supply and environmentally sensitive waste water systems.
- Require ground or air source heat pumps and solar panels as a planning condition.
- In terms of infrastructure development, clarify what exactly is meant by 'in step with'.
- Remove the phrase 'new development proposals where appropriate' – the requirement for sustainable development should not exclude any development.
- Amend to 'prioritise and actively build safe active travel corridors to ensure safe walking and cycling routes, making these modes the natural choice over car use wherever possible'.
- Final section which says in effect what this means for planners barely adds anything.
- The wording to the effect that all applications to install solar panels or wind turbines will be supported in principle is concerning.
- Many of the bullet points would not be applicable to some types of development – policy should contain a more limited number of criteria, with more detail as relevant in supporting text.
- Some of the points have potential to be overly onerous and restrictive if interpreted literally – such as 'retain and enhance locally important natural and historic assets, landscapes and townscapes' – there are no caveats or flexibility to allow for planning judgement.
- Policy should be shortened to focus on the aspiration to achieve sustainable development within NSC and what it means locally, specific reference to the NPPF, the bullet point examples are moved into accompanying paragraphs and reworded to make it clear that they are examples/suggestions rather than a prescriptive checklist.
- Mention protection of the Green Belt.
- Useful to have a hierarchy/weighted approach as some will be more important to deliver earlier than others.
- Objective 3.6 should not refer to 'where possible' in relation to protecting and enhancing biodiversity, geodiversity and green infrastructure as this doesn't accord with Environment Act or NPPF. While on site enhancements might not always be possible, it is possible to secure them off sites and this should be a clear objective. For example, they might best be located close to the development site and/or linked to GI corridors/nature recovery network and the aims of the local nature recovery strategy.
- Amend first bullet to 'address the climate and nature emergency'.
- 3.3 - climate emergency policies do not sit comfortably in the strategic policies section – these are netter covered by DM policies.
- 3.4 – convert this into supporting text which sets the scene for more detailed DM policies.
- 3.13 – add 'where appropriate and viable'.

Additional general themes and issues which were raised:

- None

Policy SP2: Climate change

A total of 122 comments were received against this policy. 20% objections, 52% Support with amendments, 28% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Viability is an issue raised in many comments, with the application of policy should not undermine the deliverability of viable development (especially affordable).
- Must justify and demonstrate through appropriate evidence what standards and definitions are sought and properly tested through viability assessment.
- Flexibility needs to be embedded within the policy. There are few caveats and limited flexibility embedded into the policy wording.
- Policy requirements lack adequate detail. Policy wording should be amended to reduce the vague and generalised detail listed in the bullet points.
- Energy performance, technical standards and carbon impacts are most effectively addressed through national Building Regulations. There is limited justification for setting local standards. Future Homes Standard is the direction of travel for nationally established technical standards.
- Large scale development of the green belt and productive agricultural land contradicts the climate change policy. This should be used to produce food.
- The wording is too onerous, a transitional approach is required. Target of carbon neutrality by 2030 is ambitious and won't realistically be achieved by all development at start of plan period.
    - Net zero standard for new buildings should not be a mandatory requirement.

Reasons for support:

- Climate emergency understood and the need to act is imperative.
- Net zero energy standards should be mandated.
- Renewable energy technologies should be a compulsory feature on all new proposals.
- Development should be encouraged where it has easy access to renewable energy, especially where these can be enhanced through development contributions.
- Support, but policies are needed to support larger scale local food production (market gardening/ orchard development/ small scale farming).

Suggested amendments:

- Amend policy title to read 'climate change and biodiversity loss'
- The final line should read: '*This policy sets the overall strategic framework to help deliver the Council's climate change and biodiversity objectives.*
- Mitigation and adaptation are not enough. Include the words regeneration alongside climate change.
- It is unclear whether proposals must meet some or all of the 11 criteria listed. Categorise priorities, so those that are essential to delivery are distinguished from those that are important i.e. access infrastructure compare with a net zero standard.
- Change from 'development proposals will be *supported* where they' to 'will be *accepted* only.'
- Change to 'development, proposals will be ~~supported where they~~ *encouraged to*'.
- Wording would benefit from adjustment to read *'where appropriate and viable'.*
- As written, proposals will be supported, but not mandated. If the requirements are not made mandatory, then they will not happen
- Bullet 1 – should not just reduce greenhouse gas emissions but cancel and actively extract emissions.
- Bullet 2 - should be Net zero Carbon negative energy standard for new buildings.
- Bullet 8 - should not include the words, '*wherever possible*'.
- Bullet 9 - Deliver green infrastructure and enhance biodiversity - these should be two separate points. Green Infrastructure should include reference to *nature-based solutions*, from carbon storage and sequestration to slowing the flow of flood water and providing shade from the sun.
- No reference to local nature recovery strategies which must be the way to implement the policy
- Bullet 11 - amend '*encourage*' the reuse of existing buildings to 'require' reuse.
- Include reference to hydrogen as a low-carbon source of energy.
- In justification, mention that the council declared a nature emergency in November 2020.
- Definition of active travel in glossary should specifically say – 'prioritising cycling for commuting'
- Duplicates policy detail and covers same matters in DP6, which have some inconsistencies and differing requirements.
- it was recommended that the following words were removed: Minimise energy use ~~and demonstrate that residual energy demand can be met with renewable forms of energy.~~
- Where SP2 retained, the detail (with amendments) from DP6 is more suited as supporting text.

Additional general themes and issues which were raised:

- Policy is commendable but ignores the elephant in the room 20,000 will generate unsustainable greenhouse gas emissions.
- Baseline with targets required, cascaded to communities, town and parish councils for implementation.
- Engage with businesses and developers on the SPD
- How will standards actually be met/ enforced etc?

- Should be automatic rejection of any proposals not including solar panels on roofs, heat pumps or other low carbon heating.

Travel:
- Low-cost accessible public transport is key to encouraging people to take up sustainable travel. Not clear how active travel/ effective public transport will be promoted.
- The Banwell bypass will undermine attempts to meet targets for carbon emissions. New road building should be avoided.
- Any further development at Bristol Airport should be looked at within context of carbon budgets. Aviation emissions are in the 6th carbon budget, within the period of the LP. Must be able to show that this budget is not undermined. A monitoring regime should be in place requiring evidence of carbon emissions from aircraft.
- Car clubs, electric bike storage and financed car clubs needed.
- Can't reach carbon neutrality when houses are built away from work – development should be as close to Bristol as possible.

Green infrastructure/ biodiversity:
- Plant trees, not houses.
- Needs to take soil function into account, significant impact large housing developments on greenfield sites will have on loss of soil resources/ soil compaction will cause run-off and flooding elsewhere.
- More efforts must be made to improve water quality.

Policy SP3: Spatial Strategy

A total of 196 comments were received against this policy. 50% objections, 33% Support with amendments, 17% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Respondents objected to the spatial strategy on the grounds that the housing requirement was wrong. These issues are covered in the response to SP8: Housing. Some objected in terms of the number being too high and that the government's housing target should be challenged. Others stated that there was insufficient capacity to meet the standard method target, that this was a minimum, the requirement had increased in April 2022, there should be additional capacity identified to minimise the risk of non-delivery, and also the total should include unmet need from Bristol. As government policy on housing targets may change, need to explore lower assessments of housing need. Government housing target takes no account of flood zones, Green Belt and SSSIs.
- The plan period should be extended by 1 or 2 years to ensure a 15 year period post-adoption, or the plan period should be extended to 20 years to match the SDS.
- There should be sufficient flexibility at all settlements given the scale of housing need, even smaller settlements could be made more sustainable.
- Create new towns or villages.

- There was a view that the strategy should be more urban focused, with more growth at Weston and the edge of Bristol as this performs best against the SA. Alternatively, the strategy was seen as too Weston-focused or an unsustainable level of growth was proposed for the Nailsea area.
- There were challenges as to what development in villages and rural areas 'will relate to local community needs' meant, how it would be assessed and whether the plan's allocations really reflected this. There was concern about the lack of facilities and infrastructure in villages. Others felt there should be more development at villages and settlement boundaries should be relaxed and should not be restricted to local community needs. Some wanted the CS32 approach to be retained allowing development adjacent to sustainable villages.
- There was a lot of concern that the proposed growth at Backwell was inappropriate for a village and did not reflect local community needs.
- Not enough jobs to support the level of proposed housing and to respond to changing employment needs.
- Need for more development in the Green Belt, to take account of needs of Bristol and also at Green Belt villages. More consideration to setting out how sustainable development can occur within the Green Belt, especially near to existing or deliverable high quality public transport corridors.
- Large scale development in rural areas is not in keeping and risks ruining the character, and it is wrong to build on good quality agricultural land.
- Fails to achieve a radical reduction in carbon emissions.
- Need to plan for sustainability over the next 50/100 years – don't prejudice optimal decisions for the future.
- Maximise dwelling capacity on existing sites.
- Defended flood zone is different from other parts of flood zone 3 – should consider options outside the Green Belt at towns. Need to consider flood areas as sequentially preferable to Green Belt, and areas close to towns.
- Failure to address the issue of how present transport infrastructure will cope with the additional traffic. Concerns about traffic in Nailsea area and impact on Tickenham Road.
- Locate growth at locations with existing or proposed public transport opportunities.
- Bristol Airport is important in economic and transport terms and should be identified as a growth location and positively plan for its development.
- Fails to recognise potential of settlements between size of town and village excluded because of Green Belt. Pill is a significant semi-urban local centre offering positive sustainability with active travel accessibility to local jobs and services and public transport to Portishead and Bristol.
- Disagree with how the policy has been applied to the selection of Nailsea and Backwell as a growth location; lack of development sites in the north away from the overcrowded A370 and A38; substantial infrastructure required.
- Pushing new housing into limited high density locations will accentuate a rural urban divide – housing should be provided across the district and not just in strategic locations – decarbonisation of transport and changing work patterns weaken sustainability arguments. All villages outside Green Belt should be assessed to see if growth would allow the community to meet a critical mass and all other villages should accommodate growth of 5-10%.
- Proposed locations at Nailsea are unsustainable with poor infrastructure and set away from the town centre.
- Be bolder with mass transport.

- Active travel is optimised on level ground and focused on access to main shopping areas.
- Concern that strategy relies on a few large allocations.
- 'Well served by public transport' is not sufficient – need to consider journey times to places of employment.
- Before cars, villages were the original 20 minute communities – allow infill but encourage more dense housing, green transport hubs and support waste to energy schemes.
- Nailsea needs more support to achieve 20 minute community status.
- Acknowledge role of University of Bristol in terms of education and the economy.
- Give preference to high quality community-led developments – low carbon construction, zero energy, 50% affordable housing.
- Unconstrained non-Green Belt opportunities at villages should be maximised.
- When considering settlement hierarchy, need to consider adjacent areas of Bristol and commuting patterns. Many households moving to North Somerset will retain strong functional links to Bristol.
- Villages need to grow but at a sustainable rate with infrastructure in place – avoid unplanned speculative development.
- Wolvershilll will lead to commuting and congestion. Build houses closer to employment areas.

Reasons for support:

- Agree with urban focus approach and use of brownfield and urban sites.
- Support avoidance of flood risk areas.
- Support development at villages and in the countryside to relate to local community needs. Development in rural areas is relatively less sustainable. Protect identity of villages.
- Importance of design and placemaking.
- Existing settlement boundaries should be retained to prevent sprawl in the countryside.
- National Highways – support principles which align with circular 02/2013.
- Natural England - strategy should help create less car dependency, consider brownfield first and protect land of high environmental value.

Suggested amendments:

- The Local Plan makes provision for a minimum of 20,880 new dwellings and a minimum of 70 ha employment land within North Somerset over the plan period 2023-2038. This is addressed under the response to SA8: Housing.
- Delete 'the amount of development at villages and in the countryside will relate to local community needs'.
- Need for a key diagram.
- Additional general themes and issues which were raised:

Policy SP4: Placemaking

A total of 76 comments were received against this policy. 14% objections, 51% support with amendments, 34% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Delete policy. Unreasonable requirements on new development beyond the expectations of the NPPF which will delay the decision-making process. Development should only be asked to demonstrate a robust design process in accordance with updated Council Design Guidance
- Unrealistic to expect communities to collaborate on subjective design matters
- Quality should come before profit
- Current development erodes the character and culture of the village (Churchill)
- Can't improve design without a change in building regs
- Backwell development is against the principles of placemaking, will not enhance/protect local character.
- Support future proofing against climate change

Reasons for support:

Although there was some outright support for this policy many respondents thought that it could be improved:-

- Welcome the need for Community Engagement Statements from developers for each development, but unclear how this will happen to ensure better outcomes
- Support the policy but last bullet point should be removed as it is negative
- Minimum densities should be defined but go hand in hand with good design and meet the needs of the community
- Engagement shouldn't be tick box but meaningful and respect the culture of the village. 4
- Could be strengthened by inclusion of a reference to nature recovery and the contributions that development will be expected to make towards the GI plan.
- Highlight that a greater emphasis should be placed on recognizing the character/identity of a village and respecting the wellbeing of existing residents. 7
- Should also identify what constitutes good design in North Somerset
- Placemaking is an active continuous process. Should translate the placemaking criteria into indicators which can be measured as the development progresses
- Should include a requirement for blue infrastructure and consider SuDS early in the design process.
- Could be improved by ensuring that all new builds include solar panels
- Principles should be adhered to and North Somerset Council should be robust in challenging developers on design
- Policy should also reference good quality public realm and reference good practice ie. Manual for Streets 2 and Streets for all as well as *Street Design Standards Current and Withdrawn Practice (2020)*
- Should prioritise these criteria differently-climate change first
- Parish Councils should be encouraged to have Green Charters to support modern methods of construction

- Should be amended to remove the need to adhere to engagement responses.
- Needs to be more prescriptive in relation to zero carbon design
- Integrate green infrastructure principles and support biodiversity net gain
- Support the criteria but don't see how they can be applied successfully to allocatios in Backwell
- Support the criteria but they haven't been applied to the new developments in Churchill.
- The character of villages should be emphasized more. It hasn't been respected in recent housing developments
- Support the policy, but sustainability must last throughout the lifetime of the development
- Refurbishment of existing buildings should be fully supported.
- Should include parks and gardens and allotments
- More detail needed on environmentally sustainable communities
- Remove "as appropriate". No mention of how this will be decided.
- Need to evidence how allocated sites will encourage "healthy lifestyles and encourage active travel" and how it will be delivered through a site specific Travel Plan
- Wider variety and style of housing is needed.

Suggested amendments:

- Delete Backwell allocations because they don't conform to SP4
- Should emphasis the need to respect the character of villages more
- Add the protection of historic buildings and conservation areas
- Remove "appropriate"
- "proposals which fail to demonstrate they have effectively assessed requirements" should be replaced with "to show they have complied with these requirements". Or …."requirements will not be accepted for consideration".
- Remove last bullet point
- Include a reference to nature recovery and developer contributions towards the GI plan
- Greater emphasis on respecting the existing character of villages
- The supporting text which states "Proposals should demonstrate how they have maximised opportunities for physical activity and recreation including active travel through the design of private and public spaces and green and blue infrastructure" should be within in the policy

Additional general themes and issues which were raised:

- None

Policy SP5: Towns

A total of 40 comments were received against this policy. 14% objections, 51% support with amendments, 35% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Not enough plans for additional infrastructure to support increased growth in towns with particular reference to Nailsea.
- There needs to be more investment in public transport to make towns sustainable
- It is unreasonable to expect all new developments in urban areas to provide green infrastructure.
- Development should still be allowed to come forward adjacent to the settlement boundaries of towns as is currently allowed the existing Local Plan.
- Portishead has already grown dramatically in the last twenty years. It needs to consolidate, not potentially be allocated further numbers to meet shortfalls.

Reasons for support:

- Development of Nailsea and Backwell is important to help the viability of these places
- Policy allows for opportunities for regeneration and revitilisation of towns.
- Agree that Weston-super-Mare is the most sustainable location in North Somerset.
- Agreement that sequentially the towns should be the first places to consider in terms of locating future development.

Suggested amendments:

- Delete first bullet point of policy as this is best located in SP4: Placemaking
- The policy should recognise and acknowledge the importance of Bristol as a centre of employment particularly in respect of Portishead and Nailsea and seek contributions to create a safe cycle path route between these centres and Bristol e.g. alongside the A369 in the case of Portishead.
- More flats should be provided near towns centres to meet the housing needs of older people. The current plans contain too many houses that are most profitable to developers (i.e. 3, 4 & 5 bed detached houses) and not enough small houses or flats within easy reach of town centres.
- More reference needed in the policy on car free, or car clubs and more emphasis on 20 min neighbourhoods. On delivering mixed developments that might include health facilities. Schools next to homes. Local high streets.
- Not enough guidance in the policy on how developers will meet the aims.
- Agreement with the aims of the policy but feeling that some of the allocations and non-allocations don't reflect those aims e.g. sites north of Nailsea should be included as they are nearer Nailsea town centre than the proposed sites at south west Nailsea.
- Include additional bullet point which reads: "where appropriate to include or encourage a wider mixture of development uses which support the principle of sustainable forms of development."

- Should not assume that the towns are the most sustainable locations in North Somerset and reference to this effect should be removed from the justification.
- No reference to non-retail town centre uses
- Should be more emphasis on utilizing empty homes.
- Whilst the Local Plan concentrates on the four main towns, it is important to recognise Pill as a significant semi-urban settlement, 'considered to be relatively sustainable in its own right with a range of services and facilities which can be accessed by walking and cycling.'

Additional general themes and issues which were raised:

- Where brownfield sites are redeveloped there should be a reduction in existing surface water (rainwater run-off from impermeable areas) by the implementation of multi-benefit on site SuDS. Where an increase in foul sewerage discharge significantly outweighs any reduction in surface water discharge (i.e., a conversion of a car park to a block of flats) capacity improvements may be required.
- A number of settlements are close to national and international designated sites– development in these locations, individually and/or cumulatively, could result in adverse effects on these designations.
- Pill and Easton-in-Gordano is a rural village with only a limited range of services. It is not a semi-urban settlement having the characteristics of a town with a full complement of essential and non-essential services providing choice and value for those living there.

Policy SP6: Villages and Rural Areas

A total of 125 comments were received against this policy. 49% objections, 32% Support with amendments, 19% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Opposition to proposed new housing sites at Backwell. Backwell is a village and should be treated as such in terms of the spatial strategy.
- Allocating sites at Backwell is contrary to the aims of this policy e.g. development will have an adverse impact on the local character of the area and on local infrastructure.
- Objection to the bypass around Banwell
- There should be more small sites allocated for housing at villages rather than large strategic allocations.
- General concern regarding the second part of the policy which lists criteria where other uses maybe acceptable outside settlement boundaries. It was felt this is too permissive.
- Cleeve has been overlooked – potential for housing development there.

- Objection to removal of current permissive approach to allowing development adjacent to settlement boundaries. Felt that this does not allow the flexibility for potentially suitable and sustainable sites to come forward over the plan period.
- Objection to the amount of development proposed around Churchill on top of what has already been built as it is felt that this is negatively impacting on the road network and capacity of community facilities.
- Objection to the restrictive nature of the policy in terms of development outside settlement boundaries and the use of settlement boundaries generally as a policy tool to control development as it is felt they are too arbitrary.
- Concern that the strategic allocation at Yanley Lane will impact on services in Long Ashton contrary to the aims of this policy.
- There should be more housing allocations at village to support and sustain the rural economy and rural services and facilities.
- The plan only has a two tier settlement hierarchy – Town and villages. The villages should not all be treated the same and the more sustainable villages should form a tier under towns with a specific policy.
- The impact of pets on the environment from new development needs to be considered
- Villages should have more protection from speculative development with particular reference to Wrington and Churchill.
- Opposition to proposed school in Ladymead Lane, Churchill

Reasons for support:

- Support for the more restrictive approach this policy takes to development coming forward adjacent to settlement boundaries. It is felt this may stop so much speculative development around villages.
- Support for the policy requiring development to reflect local community housing needs.
- Numerous comments supporting the policy as it was felt it would limit development at villages – particularly from residents in Churchill, Congresbury, Sandford and Banwell.
- Support as it was felt important that villages retain their character and this policy would achieve that.

Suggested amendments:

- The policy requires simple amendment to respond more positively to sustainable development opportunities on land at the edge of villages.
- The proposed text says: "*Development is of an appropriate scale and design and does not adversely affect the landscape or character of the area* " This should be amended to also include habitat and biodiversity!
- Policy for villages should ensure that sites aren't over developed and that impact on the transport network is a key consideration.
- The phrase in the policy which states "other uses may be acceptable outside settlement boundaries" is too permissive and should be removed/amended. It appears to be a 'get out' clause that will enable too much flexibility for development proposals to come forward unnecessarily. Suggest clarity in adding 'development outside or adjacent to Settlement Boundaries will not be acceptable'.

- Suggested that the bullet points relating to outside settlement boundaries be amended to include sites adjacent to existing settlement boundaries which would afford added protection to landscape and amenity and deter speculative development applications. It would also support the justification statement "New Greenfield development or infilling is not acceptable as this would lead to a more dispersed, unsustainable pattern of development"
- Policy should allow for small self-build, community-led or Passivhaus housing projects to come forward on appropriate sites next to villages.
- More detailed design statements for some settlements might be useful e.g. Leigh Woods
- Alteration or removal of 'Suitable alternative sites are not available within settlement boundaries'. This is a perfect clause to allow speculative planning applications.

Additional general themes and issues which were raised:

- Welcome the recognition of the detrimental cumulative impacts of development, but we are very concerned as to who will make that judgement?
- Bleadon Parish Council recognises and wants to protect Bleadon's Bronze Age rural farming heritage and its settlement character and culture.

Policy SP7: Green Belt

A total of 224 comments were received against this policy. 56% objections, 27% support with amendments, 17% support. Themes and issues which were raised were as follows:

Reasons for objecting:

General

- Significant objections questioning whether all available, achievable, and sustainable development options on non-Green Belt land had been considered. Especially flood risk areas where flood mitigation can be carried out, land in NSC ownership and brownfield land.
- Many felt the housing numbers should be contested.
- Significant opposition to the loss of Green Belt land on grounds of climate change, loss of biodiversity, wellbeing, wildlife, loss of green space, access to the countryside and controlling pollution.
- The exceptional case had not been made and releasing land from the GB for new housing is not an 'exceptional circumstance'
- Not clear that the removal of GB facilitated sustainable development at all locations proposed, especially Backwell
- The review of Green Belt did not:
    - give first consideration to land well-served by public transport;
    - take account of sustainable patterns of development; and
    - ensure consistency with the development plan's spatial strategy to deliver sustainable development.

- The approach to Green Belt did not assess the strategic context, the correct and best approach is to use the most sustainable locations first, regardless of whether they are in the Green Belt. A policy-off assessment should have been applied. Disagree with the Council's assessment that it is 'sequentially preferable' to allocate land at villages in non-Green Belt locations first, when those villages might be less accessible than those within the Green Belt.
- The Green Belt Assessment (February 2022) has been selectively applied and fails to identify the most sustainable sites resulting in the least harm to the Green Belt.
- All existing permissions should be built first
- The Garden Village proposal at Churchill has been discounted without justification
- Should increase density rather than use GB
- Loss of GB should be compensated by an equivalent or larger area of undeveloped green space
- The GB around the City should be removed and extended further south to minimise traffic generation.

Backwell

- Significant opposition to East of Backwell citing more sustainable areas should be considered especially more development at Yanley but also:
    - North of Nailsea
    - Portishead
    - Pill and Ham Green
- Farleigh Fields should be built on before Backwell Common and Grove Farm
- There is a lack of detail on transport infrastructure requirements
- It is equally regarded as causing moderate harm to the GB as SW Bristol yet is markedly lower in sustainability terms
- Many questioned whether the GB release at Backwell met the exceptions test
- It is high quality agricultural land
- Scale of development in Backwell disproportionate
- Backwell lacks basic services e.g., supermarket
- The Green Belt is needed to the east of Backwell to prevent the sprawl of Bristol
- The approach to Backwell from Cleeve would be damaged
- Backwell and Nailsea would merge,
- The A370 can't cope at peak times
- Backwell Common is used by walkers its removal is detriment to health and well being
- Cycle links from the festival Wat to West Backwell not necessary Backwell Common serves as an excellent link between the two

Yanley Lane

- Significant objection to development in the Green Belt at all.
- NSC should take a strategic, long-term approach to redefining the GB to the south-west of Bristol. The capacity of this most sustainable location should be fully exploited.
- The Yanley Lane development is too big will be sprawl into the countryside, should be concentrated around Colliter's Way.
- The change at Yanley will just be start of the Green Belts disappearance and puts greater pressure on remaining GB for accessing open space

- Yanley Lane is not sustainable it will make vehicular access into Bristol for North Somerset residents impossible – many of whom need to get to work
- Yanley will be sprawl
- A38 already a bottleneck to get to the airport
- Using Yanley Lane is counter to the 'protect the Green Belt option' which was favored in the last consultation
- Yanley will harm climate change targets

Other sites

- Need to consider other sites close to Bristol including eg. Pill/Easton-in-Gordano, Failand
- Some villages could benefit from new development
- More GB sites needed to meet target and to meet Bristol's unmet need through the duty to cooperate
- Green Belt inset at Bristol airport is currently inappropriate and needs revision
- The University of Bristol's land at Long Ashton should be considered for development alongside the strategic allocation at Yanley Lane
- More land in and around the 'Category A Villages' such as Easton-in-Gordano/Pill. The Council acknowledge the sustainability of these villages and yet do not give this any meaningful weight in proposing development allocations.

New Green Belt

- New area of Green Belt opposed as a way of replacing land deallocated.
- It should only apply in locations which meet all 5 GB purposes.
- The extension of the Green Belt to the south of Nailsea doesn't appear to be justified, particularly when the housing requirement is not being met, and potential land for development is needlessly sterilised. The flood zone will ensure a gap is retained between Backwell and Nailsea
- Why get rid of Green Belt areas that already exist and make more? The plan feels contradictory.

Detailed wording

- Object to Policy wording GB will protect rural settlements-maintaining their character and identity as GB is not an urban design policy
- Development in Green Belt should not be allowed within the North Somerset and Mendip Bat SAC SPD Consultation Zones A and B. Development on pastureland within Green Belt that lies within the Bat SAC Zones A and B should not be permitted.

Reasons for support:

- Many agreed there are exceptional circumstances, supported the council's sequential approach and GB review.
- There is a need to ensure the GB is fit for the 21st century
- Support for Yanley cited

    - that demand for housing is in close proximity to employment and the need for growth of Bristol.
    - Locating development close to Bristol and Bristol Airport helps the plan achieve its strategic objective of encourage walking and cycling and high quality and effective public transport
    - Yanley Lane has sustainable transport links and is close to the South Bristol Ring Road with suitable employment land.
    - The moderate harm to the Green Belt at Yanley Lane is outweighed by the substantial benefits of the sustainable location
    - Not developing this site would result in less sustainable sites being developed and worse climate impact.
- Others supported the changes to the GB but wanted other GB sites considered
- GB must be released as it inhibits the growth of Bristol and means development leapfrogs over the green belt putting pressure on towns, villages and valuable agricultural land beyond, increasing car-dependence, traffic congestion, increased carbon emissions, encroachment on the views from the Mendip Hills AONB etc.
- Support the non-allocation of land north and east of Nailsea and maintenance in the GB for reason of recreation, agriculture, wildlife, potential for biomass and hydo energy.
- Large clusters of largely affordable/social for rent housing in Green Belt rural exception sites adjacent to villages should not be justified for their contribution to meeting the housing targets
- Important to retain and enhance the GB
- Pleased that the policy justification recognises GB as a multifunctional asset, GB could provide much more value for people and wildlife than currently.
- Support no change in inset at the airport.
- Approve of the requirement that land allocated for development in the Green Belt will be expected to deliver exceptional standards of sustainability, and to compensate for the loss of the 'green resource' by introducing innovative design for green spaces, wildlife habitats, street trees etc.
- Support proposed GB extension at Nailsea it performs well against the NPPF tests but does not outweigh the harm from development to the east of Backwell.
- The creation of new Green Belt secures the long-term openness of this area and removes the threat of further development. It also provides an opportunity to enhance the existing area through new green infrastructure, pedestrian and cycle connections, biodiversity gains and new tree planting to enhance wellbeing and healthy living. (Doesn't compensate for loss at east Backwell)

Suggested amendments:

- Benefit from listing the exceptional circumstances
- Benefit from diagram to show land removed from GB
- No national policy basis or any other particular reason why development on Green Belt land should be required to meet different sustainability standards to development on other allocated sites and it is not clear what these would be. The reference to "exceptional sustainable standards" is not justified and should be removed.
- The area lost from GB should be replaced elsewhere with an increased area to bring it up to the Mendip Hills AONB and areas not currently GB

- The Green Belt review should be revisited with a finer grain analysis at towns and higher order villages.
- Small developments in the GB should be given consideration when they are a) for affordable zero carbon housing b) acceptable and or led by the local community c) fully mitigated by additional GB designation of equal or greater area.
- Various suggestions for land to be removed from the GB.
- Need to free up more Green Belt near railway stations
- Long term management of the GB needed. Make Green Belt more productive as green Infrastructure and for carbon sequestration.
- Opportunities for any amendments should be supported by improvements to biodiversity, and dual green belt/ floodplain areas encouraged.
- The size of Yanley should be reduced and should be truly exemplar
- A positively worded policy which supports the development of sites which adjoin or are well related to the settlement boundaries would help to meet the Councils identified housing need.
- To strengthen the plan, the phased release of land should be a requirement in the policy and that this will take place later in the plan period.
- Pill, Abbots Leigh and Easton-in-Gordano, Portbury could have local development which does not encroach into the Green Belt
- Need further investigation of alterations to the current GB area to acknowledge the need for sustainable developments nearer employment areas
- Fully support the extension of the Green Belt between Backwell and Nailsea. The details need to be got right though - there is a ridge that runs from Grove Farm parallel to Moor Lane and the proposed residential allocation for Grove Farm straddles this ridge. Housing on the ridge would dominate the Green Belt extension, and have other detrimental impacts, so the Green Belt should include the ridge not stop at its base
- The new allocation of Green Belt afforded to Backwell/Nailsea would appear not to be equivalent to that area lost from the northeast of the district.
- Loss of GB should be mitigated by extending it elsewhere. The mitigation should use Biodiversity Net Gain to determine the amount of mitigation.

Other general themes and issues which were raised:

- Concern that developers will not meet their commitments
- Should consult Bristol residents
- The historic and environmental 'setting' is an important aspect of the Bristol Green Belt need further consideration
- The right use of the GB on the SW of Bristol is a huge opportunity for Bristol and North Somerset to put things right together
- Provision should be undertaken to allow people to enjoy more of the green spaces of North Somerset, free from traffic
- The value of the GB land to the ecosystem including both food production for humans and wildlife, must be considered above the contribution to openness of greenbelt and landscape

Policy SP8: Housing

A total of 271 comments were received against this policy. 55% objections, 33% support with amendments, 12% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- No need for additional housing. Housing requirement is too high given constraints such as AONB and flooding. Inadequate roads. Housing target should be challenged. Standard method is flawed – does not take account of local constraints, 2014 figures are overestimates – there are exceptional circumstances which justify departure from the model.
- Standard method is a minimum and is now 20,880. Need to consider whether housing requirement should be higher. Plan period should commence in 2018 as indicated in the Core Strategy. 40% affordability target requires a higher overall housing target. Large numbers on housing register and high house prices and high affordability to income ratio. Ignores unmet need from Bristol. More Green Belt releases. Over-reliance on Weston and Nailsea/Banwell. Can't rely on windfall. Apply a lapse rate to existing planning consents of at least 10%. Several sites will be completed by 2023.
- Failure to meet the full requirement, need an uplift for economic aspiration, affordable housing delivery, unmet need from Bristol plus 10% uplift. Service villages have capacity for further growth.
- Failure to accommodate 10% (1676) on sites of <1 ha.
- Housing supply is inflated by sites which will be completed prior to the plan period. This would increase shortfall to 4,235 dwellings.
- Large strategic sites must be complemented by with smaller sites – to meet housing need in the early years.
- Housing number should be challenged and should await outcomes of national planning reforms.
- Are housing targets based on nearby employment opportunities?
- Concern that abandoning the approach to allowing development adjacent to settlement boundaries will reduce delivery.
- Urban capacity – need a reasonable degree of confidence that sites will come forward.
- No testing of assumed site capacities.
- More provision should be made for windfall as there is likely to be more development within settlements.
- Affordability problem in the area. Bring forward substantially more development at places with train stations. There are more places to build before Green Belt.
- Object to 100% affordable housing schemes outside settlement boundaries.
- Support 40% affordable housing but resist extensions to housing suitable for older residents.
- Oppose affordable housing – it is reducing the quality of the housing stock. If there is to be affordable housing it should be segregated.
- Developers will not be able to sell First Homes in bulk to a Registered Provider – will not provide a reliable income stream. First Homes may impact on developers to sell similarly sized open market units. Could result in slower sales of similar open market units.

- Need to increase the local housing need requirement to deliver more affordable housing.
- Need to provide more on brownfield sites close to facilities – to protect green fields. Need to take account of empty homes and conversion of offices.
- Build more flats – higher density.
- Need lower density housing with gardens and parking. Cramped housing leads to future social problems.
- New development should be built to high standards and be carbon neutral.
- Need a transport plan to address/mitigate the growth.
- Development should be proportionate and incremental.
- Object to development in the Green Belt.
- Use defended flood zone 3 land and land in the Green Belt adjacent to towns and sustainable villages.
- Development in the flood zone would be less damaging than Green Belt.
- Development needed in flood risk areas given the need to boost housing supply – such as at Weston.
- Spatial strategy and capacity paper anticipates 10% from the rural areas – but only 1,676 identified – need to allocate more rural sites. Many villages especially in the Green Belt have had no housing for decades – ageing population and facilities struggle to be viable.
- Too much development in villages, it is unsustainable. Traffic assessments only focus on congestion and not impact on village environment and pedestrians.
- Respect existing neighbourhood plans.
- Need to state the existing number of dwellings for each village, and consideration given to those which have had a substantial number in recent years.
- Villages must be allowed to evolve at appropriate rates to keep their character, identity and culture and become sustainable cohesive communities. Rapid increase in development at Churchill and surrounding villages has overtaken infrastructure.
- Overall scale of development at Backwell, will make it a town, 60% increase is disproportionate, good agricultural land, Green Belt, traffic, congestion, ecology.
- Object to Yanley Lane – traffic, urban sprawl, green spaces, ecology, lack of infrastructure.
- Proportionate approach is not applied to Churchill and Langford.
- Too much planned for Weston – 30% of total – lack infrastructure, jobs, facilities, traffic, J21 issues. Allocate more growth to Nailsea and Clevedon.
- Nailsea needs affordable starter homes.
- Object to Mead Lane, Sandford – inadequate access.
- No more development in Portishead which has doubled in size over 20 years and taken its share.
- Should utilise commitment in Sedgemoor LP to provide for unmet need before considering Green Belt.
- Reliance on villages is contrary to spatial strategy – maximise opportunities such as at Locking Parklands – could achieve an additional 350-450 dwellings.
- Need to include provision to support Bristol needs.
- Growth adjacent to Bristol doesn't support NSC towns. Consider strategic site at Clevedon.
- Land south of Nailsea is unsustainable, lack of infrastructure, attractive and environmentally important.

- Housing requirements for neighbourhood plans is stated to be proportionate in relation to the number of dwellings – but disproportionate scale of growth at Backwell.
- Churchill has had its fair share – it is losing its rural identity.

Reasons for support:

- Sedgemoor not able to accommodate growth and sites at Burnham would be discounted as it is land at risk of flooding.

Suggested amendments:

- Shortfall of 799 dwellings against the minimum housing requirement and 2905 against what should be planned for – after a realistic windfall allowance has been applied and Bristol unmet needs. Plan should deliver 22,968 plus Bristol unmet needs.
- The expectation is that the first 25% will be First Homes 'or other forms of discounted market housing…' To make policy more flexible.
- Identify the 5 year supply position.
- Affordable housing should apply to sites of 5+ houses. Also include affordable housing for families and the elderly. Provide bungalows for downsizing.
- Affordable housing target needs to be tested for viability. Affordable housing policy will not deliver the stated number of units as viability will be challenged. Deliver open market housing without on site provision on smaller sites and obtain financial contribution. Bristol allows 20% affordable as long as it is commenced within 18 months of permission being granted. Should be a different rate for larger developments.
- Need to make provision for older persons housing – such as retirement villages.
- Identify land for self build schemes and community housing.
- Development in villages should be proportionate to the existing number of dwellings.
- Shortfall should be allocated outside the Green Belt – use former retail sites, villages, low lying land.
- Need to be clearer about educational requirements, more clarity on transport interventions.
- Give preference to passivhaus or similar zero carbon homes, community-led and co-housing housing and schemes delivering 50% or more affordable housing.
- Shortfall could be made up through densification of existing housing following the approach of 'missing middle housing' – multi unit or clustered house types compatible in scale with single family housing but at higher density.
- Houses should be built as small defendable groups of desirable homes each with individual designs. Provide infrastructure and landscaping prior to development.
- Include a dwelling capacity for villages and rural areas – to provide certainty and context for neighbourhood plans.
- Alternative sites and locations proposed – towns, large villages, small villages, Green Belt locations.
- Increase scale of development at SW Bristol to reduce pressure on other less sustainable sites such as Nailsea/Backwell, Long Ashton, Churchill.
- Include more dwellings close to Bristol where people work, including Portishead to support rail proposal.

- Build more around Weston and ditch plans for Wolvershill and Yanley Lane.
- Need to consider service villages in the Green Belt – Long Ashton and Pill/Easton-in-Gordano.
- Use strategic gaps outside Green Belt at Weston.
- Free up land near stations.
- Make up shortfall by releasing small pockets of Green Belt land within 10 minutes of train stations.

Additional general themes and issues which were raised:

- Many locations are close to international, national and locally designated sites and the AONB – need further information to understand their existing natural capital value.
- Avoid land at risk of flooding – these are not 'reasonable' alternatives.
- Reconsider land at risk of flooding such as at Clevedon – for tidal flooding sea defences will be retained and improved, and M5 embankment provides additional protection.
- Create transport hub for every 20 minute community. – could be a secure place for deliveries, central place for waste collection and recycling.
- Redevelopment should be net carbon and biodiversity positive and increase insulation, renewable energy, rewilding etc.
- Where there are strategic sites the plan should look forward at least 30 years (NPPF paragraph 22).
- To ensure a 15 year plan period, need to add an additional year's requirement = 21,424.

Policy SP9: Employment

A total of 86 comments were received against this policy. 35% objections, 42% support with amendments, 23% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Employment allocation should be made at other towns. E.g. Land west of Kenn Road should be allocated as an employment-led allocation.
- Yanley Lane allocation should be extended to enable a considerably larger employment provision on land north of the railway, alongside a secondary school and open space.
- Large amount of employment land allocated to two proposed strategic sites (LP1 and LP2). Land east of J21, WSM should also be considered for mixed use, including employment, and could deliver the J21 relief road. This option featured in all Spatial Strategy approaches and WSM should remain a focus for employment growth as the main economic center in North Somerset.
- Why such a large area of employment land at Yanley Lane when Bristol is so near and accessible?
- Insufficient transport links to new employment areas in Weston-super-Mare.

- Objection is raised to Policy SP9 as it does not provide flexibility to accommodate economic needs not anticipated in the plan, allow for new and flexible working practices (paragraph 82 of the NPPF) or support a prosperous rural economy. As currently drafted Policy SP9 restricts employment development to a limited number of locations and 'within' villages in the rural area. Similar comments received around enabling additional employment growth on the edge of more sustainable village as part of larger mixed-use developments.

Reasons for support:

- Strong support in principle for policy to support economic growth.
- Welcome the language and aspirations around the provision of employment land, its importance in providing jobs and opportunities and the role of business in helping to tackle local inequalities and contribute to more sustainable communities. Suggestion that North Somerset will be an even more important location for business growth post-pandemic.
- Support for the related policy DP20 and the approach to safeguarding business land.
- Support employment provision in sustainable locations with good road access and avoiding higher quality agricultural land.
- Support 10ha allocation of employment at Yanley Lane but would oppose any additional.

Suggested amendments:

- Additional 25ha site at J20 for logistics sector – distribution and warehousing. This land is in the flood zone however there have been other comments making the case for employment land within the flood zone.
- Representations making the case to release Green Belt land within the Yanley Lane area to deliver significant economic growth
- Employment land provision is revisited with land allocated to mixed use developments in sustainable areas including Portishead.
- Support initiatives that support hybrid or fully virtual businesses, perhaps with more support for rural remote working hubs, which would provide an office environment where people could work remotely without the need for long commutes, further reducing overall environmental (and social) impact and strain on our transport systems.
- Policy SP9 could be more ambitious by making specific provision for high value employment uses linked to North Somerset's existing, strategic assets including Bristol Airport.
- Policy SP9 should be amended to allow appropriate economic development outside but adjacent to villages and in other locations not identified in the plan where a specific need or demand exists. The broad distribution of employment land should also be expressed as a minimum.
- The Local Plan needs to clearly set out larger sized strategic sites that
- will be able to fulfil future inward investment queries. This could either be in locations best suited to do so, close to urban areas (notably Bristol), but should also review how the vital international connectivity assets within North Somerset of the port and the airport can be utilised to deliver more ambitious additional employment growth space as part of or adjacent to these locations.

- Importance of B2 uses within the local economy - Would like to see particular attention to both securing existing B2 employment provision (preventing it being lost to either residential or B8 uses), but also in providing significant future provision for this use, including in response to the squeeze in supply happening in Bristol over the plan period. Catering for Logistics and B8 demand.
- SP9 should include specific reference to enabling employment land as part of mixed use growth opportunities at villages e.g. east of Backwell.
- This policy should give more emphasis to the role of premises for smaller start-up business, local business hubs, working at home and to the important role of Royal Portbury Dock in generating employment opportunities.
- Local businesses should be encouraged to engage in local apprenticeship schemes/work experience schemes, and should be encouraged/required to advertise vacancies/employ local residents.

Additional general themes and issues which were raised:

- Allocation of generic, non-specific allocations within the strategic residential areas lacks a clear and coherent economic strategy.
- Failing to meet market demand – 'more of the same'.
- Employment quantum at Yanley Lane should be expanded to allow for a larger employment campus on an extended development area.
- General concerns around lack of employment, the need for local employment opportunities alongside housing, and the need to address unsustainable commuting.
- Unclear how the quantum of employment land has been calculated and distributed.
- Additional need for employment space in Portishead.
- Potential oversupply of employment land compared to evidence of forecast demand, and comment upon the employment-led strategy and reference in SP9 to providing employment in tandem with housing. Propose reallocation of employment land at Parklands to residential (Homes England).
- However, some comments around the inherent uncertainty of planning for employment growth and some ideas around mechanisms to build in flexibility e.g. all larger sites having an employment quota (see below comment extract):
- The idea that there can be any realistic estimate of employment needs up to 2038 is misleading. At the beginning of the last structure plan was Brexit included, or the pandemic? And in this next plan we are likely to see large scale changes because of climate change. I suggest that each larger scale housing development has work/business units put aside within it. I can further suggest that these units may allow 5% of the area allocated to affordable housing, i.e. in a 100 unit development, it's 40 units of affordable housing, or 35 with 5 spaces for work units. North Somerset promotes the concept of ultra-local working.
- Some comments around the recent changes in the way we work including flexible and remote working and that this should be reflected in the way we plan for modern work space. (Specific comment below under 'suggested amendment').
- Potential mismatch of housing and employment allocation to the Nailsea area, and employment allocation is not clear, including whether it is realistic. Employment should come before or alongside the housing to avoid/ minimize unsustainable commuting.

- Active travel and public transport should be upgraded so people have greener options for travel. Equally many comments endorsing need for employment sites to be close to road network.
- Uncertainty over what employment allocation means for the Nailsea Backwell area – the 8.1ha, and employment at the other Strategic Sites.
- Few employment opportunities in Backwell and so workers will have to commute to Bristol adding to road congestion.
- Potential to create something unique for the area like a truly sustainable business park that encourages businesses that are innovative in the field of sustainability to the area? The next generation of great thinkers and scientists in this field or is it just more bog standard industrial and retail units?!
- Building employment sites in flood plain should be possible.

Policy SP10: Transport

A total of 137 comments were received against this policy. 32% objections, 48% Support with amendments, 20% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- New bypass between Station Road and A370 around Backwell will encourage more traffic and does not accord with minimizing carbon. Will also have a landscape impact on the valley between Backwell and Nailsea.
- Both options – east or west of station would be very damaging in terms of pollution, noise and visual impact.
- Major concerns with not allowing through car traffic along Wolvershill. Will cut Banwell off from WSM at the Morrisons roundabout end.
- No provision of the J21 relief road that would ease congestion.
- There has been insufficient assessment of the impact of increased traffic on residential areas, in particular small villages.
- Serious flaws in the assumption that people will walk, cycle or use woefully inadequate public transport. 'Shared pathways' are dominated by cyclists making them dangerous for other users. Priority needs to be clearly given to pedestrians and people with mobility impairment on pavements and cycle paths.
- Transport proposals for Nailsea and Backwell are inadequate. Transport proposals also uncosted.
- Congestion in Backwell and suboptimal trains services and station configuration e.g., platform length.
- A multi-modal route linking Nalsea to the west of Backwell and planned growth is likely to align to the locational principle of the emerging plan.
- Conflict with having new road infrastructure in the policy and climate/ sustainability objectives.
- Plans are not sustainable as houses need to be built closer to jobs, and there will be significantly more commuting journeys. General point around the distribution of growth being incompatible with climate objectives, largely related to the need to travel. Places emphasis on sustainable access to jobs.

- Appears the proposed growth in Nailsea does not consider improvements for roads in nearby villages.
- The roads out of Nailsea are inadequate for all classes of motor vehicle and to integrate walking and cycling routes is not a practical proposition.
- Backwell station doesn't have capacity to accommodate additional passengers generated by the proposed new development.
- 2500 homes on the edge of Bristol will add to the bottleneck in this area.
- As drafted Policy SP10 will place an unacceptable barrier to development in some areas of North Somerset which are otherwise suitable for development and could result in development proposals outside of the main towns being unreasonably resisted. Smaller developments in village locations may not be able to fully meet the requirements of the policy as this may place unrealistic financial demands on the viability of the scheme.
- The Wolvershill Estate East of the M5, isolated from the nearest community, Banwell, has been identified by the Council's own transport ex[pert Aecom as a commuter estate.

Reasons for support:

- Support improvements in public transport and active travel. However, it is totally unrealistic to ignore the requirements of private and commercial road transport.
- I endorse the recognition that new roads are appropriate where they support public transport and community connectivity. It must surely be the aim though to reduce car use. In this respect, development closer to existing urban centres such as Weston and Southwest Bristol offer much better opportunities for reduction in personal car use.

Suggested amendments:

- A new J21 is required close to the A371.
- Inadequate roads linking to the airport.
- A more strongly worded policy presumption against new road building with only exceptional circumstances allowed.
- This draft policy as worded is unclear and imprecise. Clearly it is the limiting of unsustainable modes of transport that are of particular importance as opposed to '… limiting the need to travel…'.
- There should be a new railway station at Long Ashton as proposed over many years including by former Avon CC and more recently by prospective developers.

Additional general themes and issues which were raised:

- Backwell station isn't accessible especially for people with disabilities.
- General point around achievability/ deliverability of proposals and absence of detail.
- General feeling that principles underpinning the policy are supported e.g., encouraging active travel/ public transport however questions around the reality of travel in North Somerset and the deliverability.
- Has there been consideration of existing congestion issues and how these will be impacted?

- General comment around the lack of transport evidence/ detail at this stage. Delivery is a key concern including cost and that development isn't allowed until such time as the required infrastructure is in place.
- Principles for supporting shift in the way we travel to more sustainable modes is supported. However infrastructure needs to be in place e.g. charging for e bkes, cycle lanes etc.
- Inclusive and affordable transport system is required.
- There needs to be a recognition of the detrimental impact the M5 has on transport and residents in North Somerset, especially when it is closed or clogged up at peak travel times.
- Further assessment/ consideration of noise/ pollution from traffic.

Policy SP11: Green Infrastructure and historic environment

A total of 78 comments were received against this policy. 15% objections, 51% support with amendments, 33% support. Themes raised included the following:-

Reasons for objecting:

- Development allocations at Backwell do not meet, or are contrary to, the policy)
- The field adjacent to Westleigh Infant School should be granted to it to improve th oitifully small amenities currently available, as a condition of the West Backwell proposal.
- Access to the countryside is not achieved by concreting it over.
- Before details of proposed development allocations can be established, conservation of affected designated heritage assets must be considered including historic environment impact assessment.
- Policy referring to environmental designations alongside GI provision is confusing, too restrictive and uncompromising as worded.
- Regarding BMV land, development should be considered with and balanced against, other considerations where its release is required to meet other needs.

Reasons for support:

- Support preserving SSSIs like Weston Big Wood, Wetland SSSIs and AoNB. Non-Green Belt or AONB areas have declined in protection. Suffered, including impacts on water quality.
- Maintain local identity and local landscape.
- Very comprehensive
- Support cohesive, sustainable development but protection too, (though Banwell Bypass will undermine efforts.)
- Preservation, enhancement, maintenance of public rights of way, accessible by disabled, welcome.
- No building in Green Belt, not necessary. Protecting sensitive Green Belt landscapes would benefit Chapel Pill and Ham Green lake too. Do not build on The Downs, Portishead (used by many residents and to walk to school).
- Securing biodiversity net gain supported. Developer mitigation must not reduce endangered species protection. Too many dogs harmful.

- Have a sequential approach to BMV land use, favouring lower grades, possibly small sites loss. Greater weight to best (Grade 1).
- Protect all pastureland, especially in bat SAC consultation zone.
- Support protecting /enhancement of valued and historic sites/assets, settings.
- Green Infrastructure helps adaptation to climate change, biodiversity/open space interconnection.
- Apply to sites like South of Nailsea, and Strategic Gaps like between Yatton and Congresbury.
- Green space more important since pandemic.
- Keep all mature trees on sites Replace ash die back victims.
- Have policy statement on tree planting in urban areas.
- Peat and bogs very important, including carbon sequestration
- Small LGS at Farleigh Fields should be extended to all of the fields
- How does closing a wildlife corridor by building up to the boundary of Yew Tree Farm, "secure biodiversity net gain"?
- Mostly agree but too much emphasis on all things Green to detriment of people. Policy so high level there are inconsistencies with national policy
- Retaining all trees on a site is not always possible/desirable; development can deliver biodiversity net gain/wider benefits.
- Should be presented as considerations, not pre-requisites. Refine detail so less generic or put more in justification.
- Update and strengthen Bat SAC guidance re research on flight corridors.
- Provide a more definitive map to guide development.
- Balance creation of new public rights of way/ access to countryside with protection of nature.
- Concerned about aspirations for Nature Parks: little detail on purpose, scale and function.
- The BHS (British Horse Society) wish to be consulted on this policy; equestrian access forms part of the AONB
- Support but strategic driver should be presumption against development of these spaces.

Suggested amendments:

- Policy should refer to 'heritage assets' and desirability of new development making a positive contribution to character and distinctiveness against the great weight that should be set against the asset's conservation.
- Green infrastructure and historic environment should be separated out and simplified.
- Policy should read 'Secure Environmental Net Gain'. Biodiversity Net Gain is a crass metric that does not put the correct value on essential habitats.
- Add more details on: • Maintain and enhance the green and blue infrastructure network • Conserve, restore and enhance priority habitats, ecological networks and the protection and recovery of priority species • Secure biodiversity net gain.
- Policy should respond positively to NPPF para 177(c): assessment could demonstrate that detrimental effects can be moderated regarding the AONB.
- Add a standalone heading for Wildlife Corridors.

- Amend Justification to read “Key priority species include rare horseshoe bats, otters and water voles, key groups include wildfowl and wading birds, reptiles, amphibians and invertebrates.”
- Policy should reflect NPPF Paragraph 175 on allocating land with least environmental or amenity value, and footnote 58 requiring use of poorer quality agricultural land over higher quality.
- Amend the Justification to read 'Key Priority species include horseshoe bats, otters and water voles, wildfowl and wading birds, reptiles, amphibians and invertebrates.
- Amend the policy to "respect the landscape types and character areas"; add " in areas outside the Green Belt to include Youngwood Lane and settlements West End, Claverham, Brockley."
- In the justification: under key species, add: barn owls, dormice and skylarks
- Add the following after the words: ‘conserve, restore and enhance priority habitats, ecological networks and the protection and recovery of priority species’: Nature-based solutions such as restoration are particularly effective because, unlike infrastructure-based interventions, actions that boost biodiversity can help to tackle climate change in two ways at once: through mitigation and adaptation. As well as sequestering and storing carbon, ecosystems can help communities adapt to the negative impacts of climate change, as well as providing multiple other benefits.
- Please reference protection and restoration of peatlands.
- Include a statement supporting innovative work in rewilding projects where well documented intentions and plans are shared and articulated.
- Declaring an ecological emergency is not enough. Landscape is not thriving. Order of this list needs revising.
- Add to statement on protection of BMV land: to work collaboratively and in partnership with stakeholders to reduce and remove farming practices that negatively impact the soil, water and wildlife. Promote low input agriculture and work to improve soil quality, water quality, biodiversity and carbon capture in the nature landscape.
- justification should include reference to the Environment Act, and establishment of a Local Nature Recovery Strategy for North Somerset as a means of achieving this.
- Title should include 'natural environment' or 'biodiversity'
- Add reference to enhancement and reversing declines, to securing biodiversity net gain. (More powerful.)

Additional general themes and issues which were raised:

- Please ensure you do deliver on these important issues. Needs to be stronger implementation of policies and detail for funding, implementing and monitoring a biodiversity action plan.
- plenty of available building plots exist outside of greenbelt land; use of these sites is not necessary.
- Do not build on The Downs, Portishead (used by many residents and to walk to school).
- Top priority should be given to an increase in biodiversity, (nature emergency); the AONB and coast should prioritize this.

- Historic and cultural heritage should not be prioritized over energy efficiency, generation and access to jobs.
- Plans for development will damage many of the more attractive landscapes and wildlife rich areas, with good walking and cycling routes and/or heritage like listed buildings, like west of Nailsea and remaining land on Youngwood Lane; do not extend settlement boundary to include latter.
- Agri farmers spraying insecticides and fertilisers and destroying flora and fauna is already an issue.

Policy SP12: Minerals

A total of 14 comments were received against this policy. 4 objections, 5 Support with amendments, 5 support. Themes raised included the following:

Reasons for objecting:

- Too many houses and too much pillage of the ground required.
- All 3 quarries in the north of North Somerset have been afforded exceptional rights of expansion to meet high tonnage requirement, all near Backwell, significant for local traffic, lorries, fumes and noise, further congesting roads and affecting residents' quality of life in unreasonable way. The quarrying close to residential areas can't go on ad infinitum.

Reasons for support:

- Approve of re-use of aggregate materials where appropriate
- The Mineral Safeguarding Areas lie within Bats SAC Zone A and B. Policy should recognise the use of the area by SAC bats and stipulate that suitable mitigation will be required in line with the Bats SAC SPD
- Quarries are vital natural resource but need better regulating. Durnford Quarry seems unregulated: no apparent agreed travel plan (lorries use minor country roads as short cuts), no form of wheel washing, uncovered loads, so local roads hazardous for active travel and verge wildlife obliterated.
- B&NES Council request further dialogue and engagement on the approach to minerals working. Minerals designations have been identified close to the BANES boundary.
- It is important to safeguard the associated facilities in the northern part of Stancombe Quarry containing the concrete plant, bagging plant, access road, laboratories, offices and welfare facilities; (not included in the mineral safeguarding area under SP12).

Suggested amendments:

- Recommend inclusion of the highlighted **bold** comments within the policy: "…seeking to maintain a land bank for crushed rock of at least ten years, and **subject to the environmental and socio-economic impact** allocating areas for

mineral working where necessary, having regard to the need to promote deliverability of permitted reserves of crushed rock"

- Recommend inclusion of the highlighted red comments in the last paragraph of the justification:," …(whilst not creating a presumption that the resources defined will be worked **and all such extension or development shall be subject to standard environmental appraisal).**The council has taken account…".

Additional general themes and issues which were raised:

- None