



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

Consultation Statement

Main Report

August 2022

Contents

1. Consultation Method and Response.....	3
Introduction	3
Background	3
Purpose of the consultation.....	4
Who was consulted?	5
How we consulted.....	5
Level of response.	7
2. Summary of responses.....	8
Strategic Policies	8
Locational Policies	14
Development Policies	22
3. Town and Parish Council Summary of Responses	29
4. Next Steps.....	44

Who was consulted?

- 1.11 When consulting on a local plan it is important to have a robust consultation process that allows for contributions from all ages and interests across the district and is open and transparent.
- 1.12 With that in mind the aim was to hear from as wide a range of people as possible including young people, businesses, community groups, interest groups, town and parish councils, landowners, housebuilders, transport providers, retailers and anyone else who wanted to contribute.
- 1.13 Consulting with these groups was undertaken through a variety of means including emailing nearly 5000 people on the planning policy database, press releases, Facebook videos and posts on social media and a series of face-to-face consultation events.

How we consulted.

- 1.14 The consultation on the Local Plan 2038: Preferred Options commenced on 14 March 2022 and ran for 6 weeks until 29 April 2022. During this period a range of consultation methods were used to inform the public of the consultation and maintain interest and momentum in the process. The following methods were used to consult:

Press/publications/information

- Article published on 16 March in [North Somerset Life](#) online publication E-life which reaches approximately 80,000 people across North Somerset.
- Articles were also put in In North Somerset (newsletter for the business community), Noticeboard (newsletter for schools), The Knowledge (internal newsletter for North Somerset Council), Members Only (newsletter for Members), Town and Parish Digest (newsletter for towns and parishes).
- Postcards setting out information on how to respond were given out at all exhibitions and events, and an e-version was sent to Weston College for distribution at business workshops and wider use in the college.
- Five media releases throughout the consultation period.

Social Media

- Facebook post on 11 March to launch the consultation. Received 17,930 views, 31 comments and 18 shares.
- Video about the consultation posted on Facebook on 14 March. Received 16,000 views, 74 comments and 38 shares.
- Targeted post on Facebook on 1 April advertising the Portishead consultation event. Received 13,916 views, 70 comments, 12 shares.
- Targeted post on Facebook on 13 April advertising the Weston-super-Mare event at The Campus. Received 2,313 views.
- Reminder message on Facebook urging people that it was nearing the end of the consultation and to have they say on 22 April. Received 3,345 views and 8 shares.
- Advert on Instagram targeting young people aged between 13-25.

Public exhibitions and events:

A series of public exhibitions and question and answer sessions were held across the district through the consultation period. These were publicised on the Council's website and social media channels and well as by parish councils through their social media. The events provided an opportunity for people to come along and speak to planning and transport officers or their local councillor about the proposals in the plan. The following events were held:

- **Monday 14 March** from 12.30-7pm, Banwell Village Hall
- **Thursday 17 March** from 3pm – 7pm, Hangstones Pavilion, Stowey Road, Yatton.
- **Tuesday 22 March** from 7.30 to 9pm, Backwell Village Hall
- **Thursday 24 March** from 3 to 7pm, Churchill Methodist Church Hall
- **Tuesday 29 March** from 3 to 7pm, St James Church Centre, Winscombe
- **Thursday 31 March** from 7 to 9pm, Long Ashton Community Centre.
- **Friday 1 April** from 3 to 7pm, Tithe Barn, Nailsea
- **Thursday 7 April** from 3 to 7pm, Portishead Library.
- **Wednesday 13 April** from 4pm-6pm, The Campus, Weston-super-Mare
- **Tuesday 26 April** from 3.30pm-6pm, The Barn (Clevedon Youth Centre), Clevedon.

Website and online consultation

The Council's Local Plan 2038 [webpages](#) contained all the details relevant to the consultation including a link to the online consultation system where people could comment on the policies and sites set out in the document online.

This information, with a link to the website and to the online consultation system, was sent out to 5,780 stakeholders who were registered on the Planning Policy database on 14 March 2022. The database includes parish councils, adjacent authorities and parishes, planning agents, statutory consultees, local pressure groups and organisations as well as individuals.

Further reminder e-mails were sent out on 6 April 2022 and 19 April 2022 to all the stakeholders on our database to remind and encourage people to respond.

Engagement with Young People

In order to engage with young people an advert was put out on Instagram targeting young people aged between 13 and 25 in North Somerset. This included a link to the consultation webpage. It reached 15,300 newsfeeds and had 95 link clicks, meaning that 95 people clicked through to the consultation webpage.

An e-version of the consultation postcards was sent to Weston College for wider circulation amongst their students.

An article was published in Noticeboard promoting the consultation. This goes to all schools in North Somerset.

Engagement with Business

An article publicising the consultation was featured in the In North Somerset newsletter which goes to 1800 recipients in the business community.

Promotion of the consultation on the In North Somerset social media feeds.

Weston College distributed the Local Plan consultation postcards at a series of business workshops that they were holding during the consultation period.

Level of response.

- 1.15 There were **739** respondents to the consultation with a total of **4227** comments. Of the 739 around 200 respondents submitted their representation by e-mail and the remaining respondents responded online. All comments are available to view on our online consultation system either against each policy within the document or for each respondent.

Town and Parish Councils

- 1.16 24 town and parish councils responded to the consultation (out of 39) with many of their comments mirroring the responses of the wider community within each area. Some of the issues specific to their areas raised by each town and parish council are summarised in Section 3 of this report. Many further detailed comments were also made by the town and parish councils and these are captured in in the appendices against each policy or site.

Site submissions

- 1.17 There were over 100 sites submitted to the consultation for consideration as potential allocations for various uses, but predominantly housing. The majority of these were either resubmissions of sites we were already aware of and which have been assessed though the Strategic Housing Land Availability Assessment (SHLAA) or adjustments to an existing site. There were also a number of completely new sites that hadn't been submitted in any previous consultations or through a 'call for sites' process.

2. Summary of responses.

Strategic Policies

Most comments (1,563) were submitted in relation to the Strategic Policies. The following summarises the main concerns and issues raised in relation to strategic policies. There was quite a bit of overlap in relation to comments received on these policies given the interrelationships between them.

SP1: Sustainable Development

A total of 153 comments were received in relation to this policy. 44% objections, 30% Support with amendments, 26% support.

There was broad support for the high level principles contained in the policy but some concern regarding how effective in practice they would be in terms of providing clear guidance and how they are reflected in the other policies and proposed allocations set out in the plan. While the delivery of sustainable development was accepted as being a fundamental principle, some felt that as this was already set out in government guidance, the policy was unnecessary.

Some representations considered that the policy should be redrafted to be more clearly related to the other policies and the requirements made more specific rather than being presented as a checklist. Others felt that the policy should be strengthened to emphasise the climate emergency and commitment to net zero commitment.

There was quite a bit of overlap between comments received to this and several other strategic policies, particularly SP2 climate change, SP3 spatial strategy and SP8 housing which demonstrated some confusion between the scope of each. A number of respondents used the policy to demonstrate how in their view it was not being consistently applied in terms of, for example, development in villages (especially Backwell), use of Green Belt and green field sites, and implications for car use and biodiversity.

SP2: Climate Change

A total of 122 comments were received in relation to this policy. 20% objections, 52% Support with amendments, 28% support.

There was a clear distinction between those representations who supported the approach and felt that it should go further, and those who expressed concerns about its deliverability. Supporters of the policy emphasised the imperative to act on climate change, the importance of the net zero and links to the nature emergency and how this should lead to a fundamental reappraisal of the form and location of new development. Others, particularly from the development industry raised concerns about the lack of viability evidence and how this might impact on delivery. Others questioned the net zero approach and the need for local standards and whether the

There were concerns that that new development had not been of sufficient quality and that a policy was required to ensure standards improved, particularly in terms of reflecting local character. There were some concerns that the proposed strategic development sites are contrary to the placemaking principles set out in this policy and that greater emphasis should be placed on recognising the character, identity and wellbeing of existing villages and residents.

SP5: Towns

A total of 40 comments were received in relation to this policy. 14% objections, 51% support with amendments, 35% support.

There was general support with the principle of focusing development opportunities at the towns and the objectives set out in the policy. However, there were concerns about the lack of clarity in respect of transport and other infrastructure to support the new development. Some felt there should be more guidance about the type and mix of housing to be provided and greater emphasis on creating 20 minute communities and reducing reliance on the car. Some developers called for a retention of the policy approach which allowed development adjacent to settlement boundaries.

SP6: Villages and rural areas

A total of 125 comments were received in relation to this policy. 49% objections, 32% support with amendments, 19% support.

There was concern from many communities that the approach to development in rural areas was too permissive and was in conflict with the broader strategic principles relating to sustainable development and the climate emergency. Many responses related to the need to resist speculative development pressures in villages and there was concern that the proposed allocations in the plan were inconsistent with the policy as set out in SP6. However, there was significant support from communities and residents for the new policy approach which no longer allows development sites to come forward adjacent to settlement boundaries. It was felt this give communities more certainty regarding what development will be coming forward and stop speculative development.

In contrast many developer representations felt the approach was too restrictive and that there should be more flexibility such as by retaining the approach which allowed development adjacent to settlement boundaries. Others felt we should be encouraging growth at sustainable villages to provide deliverable housing sites to meet local needs and to support local facilities.

SP7: Green Belt

A total of 224 comments were received in relation to this policy. 56% objections, 27% support with amendments, 17% support.

General concern over the perceived absence of traffic assessment and detail regarding the transport strategy. Also concern over the deliverability of proposals including costing.

SP11: Green infrastructure and historic environment

A total of 78 comments were received in relation to this policy. 15% objections, 51% support with amendments, 33% support.

There was strong support for the overall approach towards green infrastructure and the historic environment in terms of protecting and enhancing the environment, supporting biodiversity and its contribution to wellbeing. However, there were detailed representations made commenting on how the policy should be applied and interpreted, and how the issues should be assessed in the overall planning balance. Many respondents felt that the scale of development proposed in the plan and the impact of developing on green field sites was in conflict with the overall objectives set out in the policy. Clarity was requested on the approach to Nature Parks.

SP12: Minerals

A total of 14 comments were received in relation to this policy. 4 objections, 5 Support with amendments, 5 support.

There was concern about the impact of continued quarrying, and that quarrying needs better regulating, having regard to local traffic, lorries and the routes they use, fumes, noise, need for wheel washing, etc. There were concerns expressed around the impact on local roads and the living conditions of residents and on the wider highway network and some detailed comments received in relation to policy wording.

There was concern about the environmental impact of quarrying and a desire for this to be assessed, and about the need for mitigation regarding bats. There were comments relating to safeguarding and the Mineral Safeguarding Area.

Locational Policies

The locational policies received 926 comments across all the policies. The most comments were in relation to the policies relating to the strategic locations of Yanley Lane, Wolverhill and Nailsea/Backwell, as well as the settlement boundary and Green Belt policies. Below is a summary of the key concerns and issues raised in relation to the locational policies.

LP1: Strategic location: Wolverhill (north of Banwell)

A total of 47 comments were received in relation to this policy. 21% objections, 51% support with amendments, 28% support.

Some comments focus on the principle of development in this location including some suggestion that housing is preferable closer to Bristol, and that too much growth is proposed in this area. Conversely some support due to proximity to Weston-super-Mare, such as for employment access and infrastructure such as Worle train station.

Potential developers of the strategic site expressed broad support but questioned whether the number of dwellings should be expressed as a minimum, and whether there was potential for increased capacity on this site, and also to reduce the proposed scale of employment provision.

Some support for the principles of development as identified in draft Policy LP1 and features such as the proposed Strategic Gap between Banwell and the new development. Also support for the recognition of importance of green infrastructure, for habitat, environmental, and recreational benefit.

Significant concern over proposals related to transport and highway impacts. Traffic concerns include reference to the impacts of the Banwell Bypass on nearby communities, and also potential of closing Wolverhill Road to through traffic. Some comments referenced the need for additional transport mitigations including the J21 relief road. In general, with comments received to this, and other policies in the plan, there is support for active travel modes including cycling.

Some comments on the potential for impact upon sensitive species and habitats as well as the AONB to the south of the proposed development.

LP2: Strategic location: Yanley Lane (Woodspring golf course)

A total of 107 comments were received in relation to this policy. 66% objections, 19% support with amendments, 15% support.

Many respondents objected to the principle of building in the Green Belt as well as loss of wildlife, open space, recreation and impact of surrounding areas. Some felt the scale of development was too big whilst others felt there needed to be a longer time horizon given to the strategic sites in order to fully understand their requirements.

The most frequent suggested amendment included extending the GB to the AONB. Others focused on individual releases at specific locations. Nailsea Town Council for example suggested a release to the north of the town.

A recommendation for further Green Belt amendments to be made through neighbourhood plans was also made.

LP9: Strategic gaps

A total of 38 comments were received in relation to this policy. 37% objections, 53% support with amendments, 10% support.

Some of both the objecting and supporting comments included suggestions for new strategic gaps, including the following locations: Sandford/Churchill, Claverham/Cleeve, Clevedon/Kenn, Clevedon/Tickenham, Yanley area, around Elborough, west of Banwell and Bleadon/Weston-super-Mare.

There was some opposition to strategic gaps from developers/landowners seeking development of affected land, such as between Weston super Mare and Locking (Lanays Drove, and the Elm Grove nurseries area). There was related criticism of the justification for strategic gaps in the Council's background paper

There was some concern about proposed changes to strategic gaps, such as the boundary change at Hutton, and removal of the strategic gaps at Uphill and between Nailsea and Backwell.

There were some suggestions that the proposed Wolverhill strategic gap should be amended in extent.

LP12: Air safety

A total of 5 comments were received in relation to this policy. 0 objections, 1 support with amendments, 4 support.

All of the comments received were support or support with amendments. There was a general comment about monitoring and enforcing activities at Bristol Airport and the flight path there.

LP13: Royal Portbury Dock

A total of 10 comments were received in relation to this policy. 1 objection, 2 support with amendments, 7 support.

The Bristol Port Company objected to the fact that land at Shipway Farm hasn't been removed from the Green Belt and allocated for future expansion of the Port. However, other respondents such as Natural England supported the fact that expansion of the Port into the Green Belt wasn't being proposed in the plan, particularly as this area is ecologically sensitive. Comments about the role of renewable energy were also made as well as about the infrastructure to and from the Port, particularly in relation to sustainable travel for employees.

LP14: Local Green Space

A total of 24 comments were received in relation to this policy. 3 objections, 9 Support with amendments, 12 support.

The only objection actually wanted the policy to be stricter, so was not opposing the policy in principle. However, a supporting comment wanted the policy to only apply to public open space, and not affect domestic gardens.

There were a number of supporting comments, some advocating additional areas be designated as Local Green Space (LGS) to those listed in Schedule 3 of the Plan. They included sites at Backwell and in the Abbots Leigh, Ham Green Pill and Easton-in-Gordano Neighbourhood Plan area, and Local Wildlife Sites. (Note that a number of further LGS sites are also suggested in comments on Schedule 3 which can be viewed in Appendix 4.)

There were comments supporting LGS regarding wildlife in particular, and one supporting protection of green space adjacent to ancient woodland.

LP15: Preferred Area for mineral working – land at Hyatts Wood Farm, south of Stancombe Quarry

A total of 5 comments were received in relation to this policy. 1 objection, 2 Support with amendments, 2 support.

The objection questioned how heritage assets had been taken into account, although the supporting comments also included expression of concerns, notably

about the impact of quarry traffic on local roads, and requests that consideration be given to water resources and planning conditions.

LP16: Area of Search for minerals working – land at Downside Farm, south of Freemans Quarry

A total of 5 comments were received in relation to this policy. 2 objections, 2 support with amendments, 1 support.

Concerns raised included the impact of quarry traffic on local roads, impact on an aquifer, need for consideration of after-use, possible need for review of conditions, and carbon footprint.

LP17: Minerals Safeguarding Area for carboniferous limestone

A total of 3 respondents commented on this policy, 1 objection, 1 supporting comment with amendments, and 1 supporting comment.

Concerns were raised about noise and traffic associated with quarrying operations. There was a view that the safeguarded area was too tightly drawn at Downside Farm.

Development Policies

There are 64 policies in the development policies section of the plan grouped into the following themes: Design and Place-making, Transport, Economic Development, Historic and Natural Environment, Life Prospects, Countryside and Delivery. A total of 1,077 comments were received for this section of the plan. Comments on these policies are summarised below.

Design and Place-making (Policies DP1 – DP12)

A total of 368 comments were made against this section of the plan. DP5 and DP6 received the most comments with 73 and 63 comments respectively.

A wide variety of comments were received for *DP1: High Quality Design*. A number of comments related to the policy being too detailed and prescriptive and there was also concern about how effectively local communities can engage in design. There was widespread support for sustainable design and construction and for increasing the biodiversity of proposals.

There was generally support for *DP2: Residential development within settlement boundaries*. Many of the objections and amendments related to design or are addressed in other policies. The methodology for the revision of settlement boundaries was published alongside the Preferred Options.

In terms of *DP3: Residential extensions* and *DP4: Houses in multiple occupation* relatively few comments were received to each of these policies (13 and 11 respectively) and only two of these were objections. As well as the outright support given there were some amendments suggested to the policies. For DP3 there was concern that the character of areas shouldn't be affected by either extensions to provide air B&B or the erosion of parking provision. For DP4 the suggestion was to define 'satisfactory standard of living conditions' and 'unacceptable change in the balance of property types' and that access to local facilities and public transport should be a pre-requisite.

DP5: Climate adaptation and resilience received a mix response particularly regarding the requirement for a climate change adaptation statement to be submitted alongside planning applications. Some felt that it was crucial to ensure long term resilience of new development, whereas some commented that it would increase the burden and the detail within the statement would amount to a duplication of information submitted within other planning documents.

There were opposing views on to policy *DP6: Net Zero Carbon*. Some felt that the requirements are too onerous and that local standards should not be set, and rather rely on Building Regulations. Others stated that the policy would need clear viability evidence. However, there were also many comments that were supportive of this policy and stated that net zero building standard is the minimum that should be achieved in order to address the climate emergency.

In terms of DP7: Large scale renewable energy generation, some were very supportive of a dedicated policy supporting renewable energy generation. However, there were a range of comments received on the appropriateness of the Search Areas within designated sites, including the Mendip Hills AONB and SSSIs. Comment received that marine and tidal technology should be included.

For policy DP8: *Efficient use of land* there is dissatisfaction over the application of a fixed density standard and more recognition should be given for the wide variety of circumstances which will lead to differing densities and therefore non-compliance with these policies. Recognition should be given of the increased pressures which will be placed on open space, wildlife, infrastructure and services with the application of increased densities.

For policy DP9 *Flood Risk*, 23 comments were received, with more supporting than objecting. Issues raised included concerns for some proposed development locations, such as Backwell and Congresbury, regarding flooding, and particularly with climate change in future, having regard to historical flooding incidents.

There were some comments advocating change to the detailed wording, such as to accurately reflect national flood risk policy, and advocating nature-based solutions and green infrastructure. Other comments advocated use of the sequential approach and application of the policy to new transport infrastructure. However, some comments wished to ensure local circumstances are taken into account, such as being aware that sequential test requirements had been passed by previous proposals.

For policy DP10 *Sustainable drainage*, 14 comments were received, all supporting, but some issues were raised. They included concern that, because of the flood plain or high water table, some development proposals such as at Backwell, and the Banwell bypass, could make the policy's aims difficult.

Other comments included endorsement of use of SuDS guidelines, consideration of SuDS before other means of surface water disposal, and a suggested reference to protecting water quality in the policy.

For policy DP11: *Rivers, watercourses and springs*, 9 comments were received, all supporting. Issues raised included impact of insensitive management of watercourses for wildlife, and effect of climate change on water quality. There were suggestions for improving the situation, such as maintaining water levels throughout the year, and maintaining trees along watercourses.

For policy DP12: *Development in the Green Belt* some of the objections related to the changes proposed to the Green Belt rather than the policy itself which is concerned with development within the Green Belt. Some objection was raised to the clarification of the NPPF phase 'limited infilling in villages.' Others felt the policy was over complicated or not needed. Suggested amendments concerned renewable energy, community led schemes and affordable housing. The change of use from agriculture and equestrian facilities was seen as either inappropriate or needing clarification to deal with use once equestrian use was no longer required.

Countryside (Policies DP53 – DP63)

A total of 87 comments were made regarding the 11 DP policies which relate to the countryside. Most of these related to the best and most versatile land (DP53) and recreational use in the countryside (DP57).

Most respondents to DP53 recognised the finite resource of BMV agricultural land and its value for local food production. Many comments related to the conservation and sustainable management of soils. An issue was raised regarding how the policy fits into the hierarchy of other policies in particular with regards to the allocation east of Backwell.

The issues raised to DP57 (recreation in the countryside) related to the inconsistency of the policy and the proposed allocations at Backwell rather than the policy itself.

Comments on the remaining policies were broadly supportive.

Delivery (Policy DP64)

This chapter contains policy *DP64: Infrastructure delivery and development contributions* and 18 comments were made in relation to this policy. The main issues raised were around the timing of infrastructure delivery and concerns that infrastructure such as required roads, school, doctors' surgeries and community facilities wouldn't be in place at the appropriate time to serve the new housing. Also concern that contributions towards infrastructure would not be enough to cover the cost of all the infrastructure needed. There were also comments on the Infrastructure Delivery Plan and what it should contain for the next stage of plan-making, particularly in relation to transport.

3. Town and Parish Council Summary of Responses

Abbots Leigh Parish Council (also see Easton-in-Gordano PC comments):

- Proposed 6 amendments to the settlement boundary to include various properties and pieces of land.
- We object to the proposals of Local Plan 2038 that there should be no development in our area. We believe that the current version of the Local Plan understates the contribution which our area can make. Despite our location in the Green Belt, sustainable development in Abbots Leigh, Pill and Easton-in-Gordano of up to 150 dwellings would contribute to meeting housing need and current shortfall, and is consistent with both the Vision and the Sustainability objectives. Half these dwellings would be within settlement boundaries, a quarter on sites adjacent to existing settlements and a quarter on sites elsewhere in the two parishes.
- The Old School Field in Abbots Leigh and Brookside in Pill fulfil important community functions and we recommend that both of these be considered for Local Green space status.
- Policy DP42: Affordable Housing - target of 40% is insufficient and fails to acknowledge that affordable housing can be delivered on smaller sites.
- We strongly welcome recognition of the possibility of community-led, affordable housing.
- DP34 - Justification were to mention the importance of the Bristol Woods Plan which provides the local context for the maintenance and management of woods which for Abbots Leigh with much woodland, is particularly relevant and important.
- Support the view that it is necessary to consider locations for development within the Green Belt. Some contribution to meeting housing needs from locations in the Green Belt is inevitable and even Abbots Leigh could make a small contribution. The two Parish Councils (Easton-in-Gordano/Pill and Abbots Leigh) propose up to 40 dwellings, largely affordable housing, in clusters immediately adjacent to existing settlements. Damage to the Green Belt would be limited. Abbots Leigh, Pill and Easton-in-Gordano do not contribute to the openness of the Green Belt and local development would not encroach on the extensive protected green spaces of the Green Belt.
- We recognise the importance of sufficient sites for employment. We welcome confirmation of the allocated land in Portishead at Gordano Gate. 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.
- Its welcome that active travel (cycling, walking and safety) gets as much attention as infrastructure. The main Abbots Leigh concerns relate to the A 369 and to speed, safety, noise. It's unfortunate that there is no mention of pollution in this policy. It is also unfortunate that there is no mention of wheelchair users amongst the policies for transport.
- LP9: Strategic Gaps - the principle of maintaining gaps to separate distinct communities is valid in relation to Abbots Leigh, Pill and Easton. Failure to protect the gaps along the line of the A 369 at Blackmoor or Chapel Pill for example would lead to urban sprawl from Leigh Woods to the M5 Motorway.
- DP13: Highway Safety - The A 369 is continually vulnerable to overload and congestion, not only at peak hours. Further development along the A 369 would

create pollution and noise as well as affecting safety. Abbots Leigh, especially at stretches before and after the George Inn is a case in point.

- SP3 - Pill is an important local centre for Abbots Leigh. It is a significant, semi-urban local centre offering positive sustainability with active travel accessibility to local jobs and services, and public transport access to jobs in Portishead and Bristol.

Backwell Parish Council:

- The overwhelming majority of residents consider the Preferred Options proposals would be a disaster for Backwell. Responses in this consultation reflect our request that the proposed housing allocations are reconsidered. New development should be redistributed to some of the other locations that are much more sustainable and better matched to North Somerset Council policies.
- Proposed allocations are of an excessive scale – disproportionate to the size of the village resulting in a 60% increase.
- Inconsistent treatment of Backwell in the Local Plan. In some policies/documents it is referred to as a village and in others as an urban area combined with Nailsea. There is also inconsistency regarding potential employment allocation at Nailsea/Backwell and its future location.
- No evidence to justify removing land from the Green Belt east of Backwell – the plan needs to consider urban locations first in line with the spatial strategy such as Clevedon, Portishead, Ashton Vale, Pill or north Nailsea.
- The loss of Grade 1 agricultural land at Backwell would be significant.
- Removal of land from the Green Belt could lead to urban sprawl between Backwell and Flax Bourton.
- Transport solutions and proposals are very vague and general. No specific deliverable schemes are set out.
- The importance of Backwell railway station is grossly exaggerated. The station is currently inadequate (poor access, short platforms, plans for electrification, overcrowding and significant numbers of fast trains passing through (making any increase in services difficult/impossible). Therefore, new residents will be driving to work increasing traffic on the A370 including the A370 cross-road and station road which your document states should not be made even worse than they are now.
- The document does not describe where the new primary school would be in Backwell in relation to our existing schools. There are many complex issues about changing secondary school provision and this is not detailed adequately.
- Impact on wildlife will be significant for example the Special Area of Conservation and Sites of Special Scientific Interest for our Horseshoe Bats which are known to use the fields in Grove Farm as a major foraging area for the maternity colony present in Brockley.

Banwell Parish Council:

- How will the local community need at villages be determined?
- A specific need in Banwell to extend the proposed Strategic Gap to include two fields close to the village to preserve the historic setting of the village and provide sports pitches.
- The Green Belt is inhibiting the natural growth of Bristol putting development pressure on villages in the south of the district
- How will the cumulative impacts of development on the landscape character be assessed and by whom?
- Welcome the need for Community Engagement Statements from developers.

- concerns about road access and safety due to the narrow Wood Hill Road. This would need to be assessed with a wider proposed growth of this area
- Congresbury Parish Council understands that there should be some growth in the village through to 2038, however this growth needs to be sustainable, supported by good infrastructure and where this is related community desire and need.
 - Areas for new housing development that the parish council suggests are along the A370 in a westerly direction and the area north of Cadbury Garden Centre if combined with improvements to the road infrastructure in this area.
 - SP6 – welcome strengthening settlement boundaries but in terms of the section on development outside the settlement boundary, we would want to see the alteration or removal of the phrase 'suitable alternative sites are not available within settlement boundaries'. This is a perfect clause to allow speculative planning applications.
 - LP10 - disappointing there is no mention of improvements to the A370 and the need to upgrade the strategic junctions in Congresbury with the B3133 Brinsea Road and B3133 Smallway. Both junctions are at capacity and without further development pose a substantial risk to Congresbury and the development of North Somerset.

Easton-in-Gordano Parish Council (also see Abbots Leigh PC comments)

- We believe that the current version of the Local Plan understates the contribution which our area can make. Despite our location in the Green Belt, sustainable development in Abbots Leigh, Pill and Easton-in-Gordano of up to 150 dwellings would contribute to meeting housing need and current shortfall, and is consistent with both the Vision and the Sustainability objectives. Half these dwellings would be within settlement boundaries, a quarter on sites adjacent to existing settlements and a quarter on sites elsewhere in the two parishes.
- Pill and Easton-in-Gordano Parish Council welcomes the proposed extended boundary including Cross lanes and Ham Green (former hospital land). In relation to Settlement Boundaries, current NSC Core Strategy (CS 32) states that 'there is scope for these to be reviewed and adjusted via Local Plans or Neighbourhood Development Plans'. We recommend that this wording should be restated in the new local plan and, in the context of the housing growth proposed (see SP 8) we would review and if appropriate recommend adjusted boundaries in an updated Abbots Leigh, Pill and Easton Neighbourhood Plan soon after Local Plan 2038 has been formally adopted.
- Policy DP42: Affordable Housing - target of 40% is insufficient and fails to acknowledge that affordable housing can be delivered on smaller sites.
- Pill and Easton-in-Gordano is neither a major urban area nor a typical village. It is a significant settlement – a designated 'local centre' and an important hub for both the immediate and the surrounding area. It is a Category A Village 'considered to be relatively sustainable in its own right with a range of services and facilities which can be accessed by walking and cycling (Supporting Documents Rural Settlements Para 3.4). Nevertheless it has been excluded from full assessment under Stage 5 of the Spatial Strategy because of its Green Belt status.
- Pill is a significant, semi-urban local centre offering positive sustainability with active travel accessibility to local jobs and services, and public transport access to jobs in Portishead and Bristol.
- There is significant cycling to Royal Portbury Dock and we strongly support the aim to 'improve connectivity and perceived safety of routes for employees'.

- We welcome the improvements promised for Easton-in-Gordano, especially the routes to St. Katherine's School.
- Cycle lanes should be clearly separated from pedestrians and traffic, be comprehensive and well maintained and ideally have one each side of the carriageway. None of this is true of the current provision even the relatively new stretch from Abbots Leigh to Pill is shared with pedestrians. Where cycle lanes are ill maintained (A 369 with poorly maintained with gravel, rubbish and vegetation encroaching on path) there is an incentive to use the road rather than the cycle path. It is also even worse from Abbots Leigh onwards towards the turn to the Clifton Suspension Bridge. The cycle lane along the Avon from Ham Green to Bristol is very poorly maintained with potholes, mud and uneven surfaces making it impossible to use for commuting particularly during Winter months. It needs proper, ongoing maintenance to make it viable as anything other than a leisure facility.
- SP4: Place-making: In addition to addressing the needs of new communities there must be recognition of the needs of existing communities. The majority of North Somerset households live in neighbourhoods which have developed over many years, and it is important that the refurbishment, revitalisation and management of older centres are fully supported.
- Across North Somerset there are many larger houses either vacant or under occupied as the owners' children have left releasing significant unused accommodation. Many owners of larger dwellings have expressed the wish to downsize to single storey bungalows and it is essential both that steps are taken to ensure vacant homes can be occupied and that sufficient smaller sized houses are available in places they are needed.
- DP46: Homes for all - welcome support for community-led housing bringing community cohesion, permanent affordability and sustainable development. Also support for the policy that ensures a range and supply of residential accommodation for people with specialist and vulnerable needs.
- DP7: Large scale renewable energy - Some areas around the Royal Portbury Dock estate that are identified as suitable only for wind turbines below 250kW would in fact be suitable for significantly larger turbines.
- DP25: Local Centres - The proposals to enhance the amenity and accessibility of the Pill Precinct are a good example of the ways in which centres in existing communities can be improved.
- DP49: Healthy Places - We are particularly aware of the levels of deprivation in Pill and Easton in Gordano and of the levels of health inequalities that exist. There needs to be explicit reference to the NS Health & Wellbeing Strategy 2021-24 and its concept of "Thriving Communities". There must be read-across from this strategy to the Local Plan 38 so that they inform and build on each other.

Flax Bourton Parish Council

- Support much of the aims and aspirations of the draft Local Plan particularly the promotion of public transport as an alternative to cars.
- However, the draft Local Plan's concentration of preferred development in WSM, Banwell, Nailsea and Backwell (the west of the plan area) will bring increased traffic through Flax Bourton severely affecting the health and well-being of our residents. Unless alternatives to car commuting can be delivered and are sustainable combined with suitable mitigation measures through Flax Bourton, we cannot support the proposed preferred development sites and therefore the draft Local Plan.

- No confidence that the way in which values for each SA objective were assigned to each area under consideration were consistent and no explanation was given as to how they were weighted. There was an assumption in the SA of a “modal shift in transport” but no explanation was given of how this would be achieved and given the situation this seems unlikely. More likely would be a substantial increase in traffic on the A370, especially at rush hours. North Somerset Council should already be aware of the concerns of Flax Bourton residents with regards to the dangerous and difficult conditions for pedestrians within our village and of the Parish Council's attempts to ameliorate the situation.
- Sites to the north of Nailsea should be developed rather than those distant from the town centre to the southwest of Nailsea and in the east of Backwell.
- Question why no Green Belt has been identified for development (other than a minimal amount) around the North of Nailsea, Portishead, Pill and Ham Green all of which are better located for urban services and proximity to transport (Portishead railway and a designated rapid bus service route) and employment in Bristol, Aztec West and at Portbury Docks.
- Strongly challenge the inconsistent and subjective reassessment of the openness of the rural villages which has resulted in Flax Bourton being inset from the Green Belt. Therefore, object to LP8.
- We are disappointed to conclude from the limited transport evidence available for consultation that there is not a deliverable or sustainable public transport offering to shift transport along the A370 from cars to active travel and public transport.
- LP2 - Urban density of housing rather than rural density should be built in locations closer to the edge of Bristol.
- LP3 - The selection of Nailsea and Backwell does not comply with draft policy SP3. Active travel will have limited use outside the immediate area and commuter traffic will continue and increase with the housing numbers at this location and additionally from WSM and Banwell due to the unavoidable truth that Bristol is the main employment area with over 23,000 residents working in Bristol of which 84% travel by car. The only realistic option is for rail or rapid bus transport. This further requires car or bus access to Nailsea Station which must become an effective Transport Hub. These options are not deliverable without increased train services and an improved road link for buses to travel rapidly to Bristol. The only proposal in the draft Local Plan is an un-costed and probably unaffordable road crossing of the railway which will then create greater quantities of traffic being delivered to Flax Bourton creating a bigger choke point on the A370. The selection of LP3 has been made due to its proximity to Nailsea Station which requires significant infrastructure investment before it can become an effective Transport Hub.
- LP10 - This policy refers to infrastructure which has not been identified other than in very broad terms and refers to mitigations in JLTP4 which have still not been detailed and consulted upon. We can only conclude that the transport infrastructure and mitigation measures have not been properly identified, costed or feasibility tested.
- Support DP13.

Hutton Parish Council

- It is crucial to maintain a strategic gap between Hutton and Weston to maintain the character of the village. Changes to the gap at the Grange Farm site beyond the brownfield site reduces the effectiveness of the strategic gap. This was fully supported in our village consultations in 2004 and 2019.

- There are no safe walking or safe cycling routes between Hutton and Weston. We would support any improvement on this situation particularly along Oldmixon Road and establishment of the proposed cycle and walking route via Moor Lane, Hutton across the Weston Airfield site to connect with extensive network already in existence. Residents have indicated that it is critical to continue with a regular bus service to prevent further increase in car use.
- Hutton Parish Council fully supports North Somerset Council's policy on climate change and declaration of a Climate Emergency. Critical to this is the promotion of Active Travel, safe walking, safe cycling and public transport to reduce the use of private vehicles.
- Changes to the settlement boundary at the Grange Farm site extend beyond the brownfield site. Extension of the settlement boundary beyond the brownfield site would not be supported by the Parish Council. Development of the Grange Farm site offers opportunities for improvements to Active Travel to encourage safe walking and safe cycling to Broadoak School to support NSC commitment to climate change and environmental issues.

Kewstoke Parish Council

- There are two changes of concern to the proposal for amendment to the settlement boundary for Kewstoke, as defined by the village fence. The first is the paddock to the east of 'Karibu' The proposal to take this into the settlement boundary is very disappointing as there is a history of many reported breaches of planning at the site, as well as many hours spent by the Parish Council responding to and monitoring these breaches, in particular the use of agricultural land for residential purposes.
- The second is the proposal to take agricultural land and buildings to the east of the 'Hideaway' Crookes Lane into the settlement boundary. The Parish Council strongly objects as there has only been a very recent attempt to use the land for residential purposes and noting there are several ongoing enforcement investigations.
- The Parish Council concedes that several holiday caravan parks are now, through unlawful use, regarded as residential, making a case for them to be brought into the Kewstoke Village Settlement boundary.
- To try and integrate the housing plan with both transport and employment, particularly in the Banwell/Wolvershill Rd Area is going to be very difficult to achieve. Even assuming that the new inhabitants of the proposed housing are employed locally in the new industrial Area Junction 21 Enterprise Park, access will still be required by commercial transport and delivery companies. This will put further strain on the already stretched Junction 21. In reality a large percentage of the inhabitants living in the proposed "Wolvershill Road area" will still be commuting daily north to Bristol and further afield. A combination of both of the above will result in severe congestion in and around Weston and in particular Worle.
- A better solution may be to build housing closer to the current areas of employment rather than attempt to create a new area of employment in Weston super Mare.

Locking Parish Council

- Elm Grove Nurseries proposed site allocation - Locking Parish Council would consider building on the brownfield site only (where existing buildings are currently situated) to provide retirement bungalows 1-2 bedrooms provided by Housing

- Concerned about proposals to release land from Green Belt protection. In particular, development of Woodspring Golf Course will mean the creep of Bristol suburbia further into the countryside.
- Changes to village settlement boundaries should not be made to include land that has acquired residential use as a result of a lack of enforcement. This would set an unhelpful precedent encouraging further creep of residential boundaries into the open countryside.
- Why is there no specific mention of protecting the Green Belt in policies SP1 and the Strategic Priorities?

Winscombe and Sandford Parish Council:

- Proposed housing allocations – Land at Mead Farm, Sandford, Land west of Sandford and West of Hill Road: The Parish Council would have liked more information on this site allocation, as none had been received. This site is unacceptable, due to be too far from the current Settlement Boundary.
- Winscombe and Sandford Parish Council has concerns over lack of infrastructure and local services being taken into consideration.

Wrington Parish Council

- Support vision, strategic priorities and the majority of the policies in the plan
- The new allocation of Green Belt afforded to Backwell/Nailsea would appear not to be equivalent to that area lost from the north east of the district. Can it not be an area equivalent to that lost which is re-allocated to other parts of the district?
- The parish council supports the proposed insets of villages in the Green Belt and is also pleased to note that "Boundaries of villages are not being adjusted to include new green field development sites, this is incompatible with the spatial strategy."
- DP33 - 10% Net Gain is not a challenging target and a higher percentage should be demanded if we are to enhance significantly the bio-diversity levels within North Somerset. Failure to meet that increased level should also be grounds for refusal. A figure of nearer 20% should be achievable and demonstrable with some meaningful application by any developer.
- SP3 - welcome the proposal that development in the villages and countryside should be related to local community needs. More community involvement is always welcomed.
- DP19 - We would question whether the restrictions proposed are robust enough to overcome a repetition of what has happened before. The conditions are too easily challenged by use of the phrase 'very exceptional circumstances'. The robust application of the Airport Surface Access Strategy is vital in containing the avid demand and subsequent permissions which have hitherto allowed the acquisition of Green Belt land for car parking by the airport. This has to cease.
- Settlement Boundaries have been reviewed across North Somerset and Wrington's Settlement Boundary is to remain unchanged. A new Settlement Boundary is to be drawn around the settlement of Redhill and the settlement made an inset within the Green Belt. – Happy to support those proposals.
- General comments on the unsuitability of the SHLAA sites.
- SP10: Transport - Suggest that the provision of electric car charging points be included in provision of car parks or 'on street' charging points such as are available in London with, for example, 1 hour free parking available at the charging point.

- DP53 - Development on sites on lower value graded agricultural/greenfield land should also be subject to an appraisal of potential damage to biodiversity in situ prior to development being approved. Preservation and enhancement of biodiversity and land character is at the heart of NSC's policies and strategies.
- SP6 - It is 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.
- DP37 - Should the AONB also be protected from over-flying by commercial aircraft using Bristol Airport in order to prevent disturbance and pollution being inflicted on local wildlife and tranquillity enjoyed by residents within the AONB?
- Suggested amended wording to LP11: Bristol Airport.
- Would like to add the following five sites to the list of Local Green Spaces in Wrington Parish:
 - Wrington Village Green, High St - 0.03ha.
 - Recreation Ground, Silver Street - 1.9 ha.
 - Old Surgery Green, Station Rd - 0.03ha.
 - Mike Bush Paddock, Wrington Hill - 0.16ha
 - Redhill Playing Field, Church Road, Redhill - 0.44ha.

Yatton Parish Council

- Broadly supports the Local Plan 2038 but would like to see more emphasis on dealing robustly with planning proposals for developments outside settlement boundaries. We would therefore like to be reassured that there will be robust adherence to, and enforcement of, the requirement in Strategic Policy 6 (Villages and Rural Areas) for developments outside settlement boundaries to be of an appropriate scale and design and without adverse effects on the landscape or character of the area. In our view, this clause would have precluded both the Moor Road and Rectory Farm proposals from even being considered and would have set much higher barriers for other developments which have already taken place around our village.

4. Next Steps

The subject of this report is the response received to the Local Plan 2038 Preferred Options consultation. This consultation was a second stage in the Local Plan Regulation 18 consultation process. It followed the Challenges and Choices Consultations which took place in 2020. The next stage is the pre-submission document which is currently timetabled for the end of 2022.

The pre-submission stage (Regulation 19) is the consultation on the Council's final version of the plan that is intended to be submitted to the Planning Inspectorate for examination. At pre-submission stage the consultation focuses on whether the plan complies with relevant legal requirements. Consultation is for six weeks and the responses received to the pre-submission stage are submitted to the Inspector to consider as part of the examination process.

The response to the Preferred Options consultation and an assessment of any new evidence will enable the formulation of a pre-submission document. The responses received to the Preferred Options consultation have been very useful in highlighting key issues that will need to be addressed moving forward with the Local Plan.

For the next stage in the plan-making process we will be producing a report showing what changes have been made to the policies and why. These changes will be informed by comments received through this consultation and further information that may emerge through the evidence base.

One of the issues raised in this consultation was concern regarding the lack of evidence to support the proposed policies, particularly in relation to transport, infrastructure delivery and viability. As part of the next stage of plan-making further evidence will be produced to support the policies including an Infrastructure Delivery Plan, a full plan viability assessment, the next stage in the transport assessments, a Habitat Regulations Assessment, an updated Sustainability Appraisal and a number of other background papers.