

Local Plan 2036 Issues and Options All Responses and attachments

Document Part Name		Why do we need a new local plan?	
Respondent Name	Respondent Organisation	Comment	Attached documents
Backwell Parish Council	Backwell Parish Council	Notwithstanding BPC's concerns regarding the release of this Issues and Options paper ahead of the Joint Spatial Plan (JSP) examination, it is recognised that this paper is based on the JSP as submitted to the Secretary of State. The submitted JSP remains draft and subject to scrutiny at examination, which will certainly result in modifications to the plan. So, the Local Plan will need to evolve to reflect the adopted version of the JSP rather than the Submission version. For that reason, BPC welcomes the reassurance at page 4 that the Issues and Options document is not a draft plan and so cannot be relied upon by developers or promoters. It should therefore be regarded as an exploration of the issues that could inform the future Local Plan's spatial strategy, the allocation of land and the delivery of infrastructure, in the event that the JSP is adopted in a form comparable to the Submission version. BPC's comments on the Issues and Options Paper should be read in that context and without prejudice to the in-principle objection to the Backwell and Nailsea Strategic Development Locations and associated planned infrastructure.	
Brigly		The Local Plan 2036 depends upon the Joint Spatial Plan which seeks to determine housing and other needs. Therefore, until the inspectors have ruled on the JSP, comments on the Local Plan would seem to be untimely. Or to put it another way, putting the cart before the horse.	
C Allsop		I believe that the Issues & Options Document is a bit premature considering that I understand the JSP is still under the consultation phase, and it concern me that the Council is plowing ahead as if it is a fait accompli.	
Cleeve Parish Council	Cleeve Parish Council	<p>CPC believe that this consultation is premature for the following reasons;</p> <p>Firstly, the examination on the West of England Authorities Joint Spatial Plan has not yet been carried out. Further consultation on the JSP is to take place in November. CPC is a member of the Parish Councils Airport Association which has submitted a response to the Joint Spatial Plan on the issue of the expansion of Bristol Airport and believe this issue of further growth is non-complaint. CPC understand that many other groups, on other issues, also consider the JSP non-compliant. Although there is a push by all the authorities that the JSP will be adopted, there should be some changes within the Plan once examined. It is our understanding that the JSP will not allocate the new sites for housing but only identify them which allows the new Local Plan to make changes.</p> <p>Secondly, CPC reserve the right to add additional comments to our submission as information is made available on the transport network and proposed green infrastructure. CPC believe that these documents should have been made available at the start of this consultation.</p>	
Cresten		The JSP has not yet been fully formulated or examined, with valid concerns and objections to proposals such as the Churchill SDL. This consultation is premature.	
Hilary Burn		<p>The Local Plan document is unsustainable for the 21 century. It is also premature as the examination in public has not yet taken place on the West of England Joint Spatial Plan. It is unsustainable in that it advocates new roads and housing developments in the wrong location and the expansion of Bristol Airport.</p> <p>Many of the documents to give an informed comment on the Local Plan are unavailable such as the West of England Joint Transport Plan and the Bristol South West Economic Link Report.</p>	

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		<p>Road infrastructure to unsustainable housing developments of Churchill and Backwell may not be affordable, achievable and certainly detrimental to the environment. The Local Plan is premature again with the technical reports on the Sustainability Appraisal and Habitats Regulations of the West of England Joint Spatial Plan not yet published for consultation.</p> <p>Road and rail infrastructure to Bristol Airport will only add to the environmental destruction of the locality surrounding Bristol Airport. New roads generate more car traffic which in turn increases carbon emissions and global warming. The aviation sector is the fastest growing source of greenhouse gases yet this wasn't mentioned in the Plan. Bristol Airport should remain capped at 10 mppa and not allowed to expand.</p> <p>Little in the Local Plan is given on the issue of climate change which will dominate how we live in the future. For instance the plan does not show how carbon emissions from vehicle use will decrease. The West of England documents show that it is necessary to reduce emissions from vehicles; yet, North Somerset has opted to construct housing developments in unsustainable locations and create new roads.</p> <p>This document fails to show or assess alternative options to the housing developments and development of Bristol Airport. Sustainable alternatives to the proposed housing developments are available by building close to Bristol which has jobs close by and less need for new infrastructure. The proposed Plan will bring irreversible ecological damage to the area surrounding Bristol Airport and a major landscape change from a rural environment to one that is urban.</p>	
jerb44		<p>My comments on this subject were submitted in detail with the JSP. It is inappropriate for this document to be issued at this stage. In summary the proposed housing provisions and sites are unsustainable due to excessive commuting distances from most employment opportunities. A practical location close to the south Bristol ring road does not appear to have received sufficient consideration.</p>	
JLS		<p>This consultation is premature and inappropriate given that the JSP Independent Inspection has not taken place. In addition, the process of commenting is a lengthy process and involves several hours of reading, registering and commenting - something that the majority of people do not have the time or inclination for.</p>	
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K Williams		<p>This 'Issues and Options' consultation is inappropriate, premature and prejudices the decisions of the Independent Inspectors at the Public Examination of the West of England Joint Spatial Plan to which I have already responded. This Issues and Options' consultation presumes that the JSP outcome will be to approve the proposed Garden Villages of Banwell and Churchill/Mendip Spring. No one can predict this outcome.</p>	
R Waycott		<p>The Issues and Options document, and the process of consultation, is seriously flawed for the following reasons;</p> <p>1/ The Consultation process has required the consultees to be the pro-active party, in that continued effort is required to keep abreast of any developments, updates, or indeed the timescale. Learning to navigate the website is immensely time consuming, and assumes all consultees have computer access. No following up of comments, or evidence that any comments have had any impact on the document, other than acknowledgement of receipt, do not inspire the consultee to respond.</p> <p>2/ No evidence is shown of any consultation with neighbouring Local Authorities, which when considered in the light of the emerging JSP is not justifiable.</p>	

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		3/ From meetings attended, there is obviously huge confusion amongst the public, between this document and the JSP, not only in terms of the content, but which document has overriding authority. Additionally, the document is premature with regard to the JSP.	
Roger Key		<p>1. Prematurity</p> <ol style="list-style-type: none"> 1. The West of England (WoE) Joint Spatial Plan (JSP) has yet to reach the stage of being examined in public. Since the JSP was placed on deposit, inspectors deciding on planning appeals in the WoE have concluded that the JSP is not at an advanced stage of development, so little weight can be placed upon the proposals in the JSP. This will remain the case at least until the JSP has been subjected to public scrutiny and the Inspectors' report is published. Publication of and consultation on the Issues and Options Document prior to the emergence of the JSP Inspectors' report, creates confusion amongst NSC residents about the planning process, so it is both unhelpful and premature. 2. If changes to the JSP are recommended, it could well be a wasteful and inefficient use of Council Tax in North Somerset because the consultation process may have to be repeated for a revised version of the emerging NSC plan to 2036. 3. The emerging JSP and I&OD are both informed by documents that assess strategic transport issues. In the case of the JSP, it is supported by a Transport Topic Paper (in turn informed by a Joint Transport Study) that identifies the infrastructure said to be required to mitigate transport impacts arising from the JSP proposals. However, the public has yet to be informed of the transport infrastructure that the WoE local authorities consider will be needed between now and 2026. This is promised in the form of the Joint Local Transport Plan 4 (JLTP4) for which consultation is predicted in January 2019. More specifically, in North Somerset, the Bristol South West Economic Link Study (BRSWEL) is ongoing and the findings have not been made public. As the transport strategy is a crucial part of a spatial plan, it is not reasonable to invite the public to offer comment on the I&OD before both the JLTP4 and BRSWEL work are published. <ol style="list-style-type: none"> 1. Noting all the above, I request NSC to: <ul style="list-style-type: none"> ▪ delay further progress of the local plan for the period from 2026 to 2036 until the JLTP4 and BRSWEL are published and the JSP has progressed to a position where reasonable weight can be attached to it: and ▪ <u>conduct a full review of the SDLs, considering each in a full evidence-based technical and sustainability evaluation that includes options within the Green Belt.</u> The review should include site options within the Green Belt that are located either closer to Bristol or, if not closer to Bristol, that are more likely to achieve higher levels of travel by sustainable modes and shorter journeys than that proposed at Churchill. 	
Simon		My main concern at this stage is that this consultation is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors. This consultation makes assumptions about the number and location of additional housing, the sanctity of the green belt and new roads that are being challenged by very many respondents to earlier consultation and brought to the attention of the ongoing examination by the Inspectors.	
Simon R		I am totally opposed to this consultation as it is very premature. How and why does North Somerset Council think that they can assume an outcome before the independent inspectors have come to their own conclusion.....which should be independent and allowed to follow its natural and documented path!	

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		Surely there are better alternatives than to extensively build on very wet low lying land that is susceptible to flooding. The water course will get pushed sideways and affect natures balance, and the added costs of this would make the affordability less attractive and thus the end purchasers/owners would have to travel further for employment and only add to our congestion issue. What about retaining the character of our individual villages?	
terry@puryend		The Local Plan consultation (which includes this Issues and Options consultation) is premature. NSC cannot conduct a proper consultation when very significant issues have yet to be addressed through the JSP process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination in this manner. Carrying out these consultations would require multiple participants to presume the JSP Inspectors' findings which are at least 12 months away from being concluded.	

Document Part Name How the housing requirement will be met:

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Alder King (M Cullen)		<p>1.1 Alder King Planning Consultants have been instructed by the University of Bristol to submit representations to North Somerset Council's Local Plan 2036, 'Issues and Options' consultation.</p> <p>1.2 If adopted, the Joint Spatial Plan (JSP) will be the strategic development plan for the West of England authorities and will set the development requirements for the constituent authorities as well as broad locations for growth in the form of strategic development locations up to 2036. It was submitted for independent examination in April 2018.</p> <p>1.3 As a West of England authority, North Somerset Council are required to review and update its existing local plan alongside the emerging JSP in order to provide detailed guidance to support the JSP's implementation.</p> <p>1.4 These representations have been structured by looking first at the Mendip Spring (Churchill) Garden Village; how the design principles are evolving in the current masterplan and the Council's alternative scenarios for accommodating the strategic growth. This includes a general commentary around the issues and options concept diagrams.</p> <p>1.5 The second part of the representations assess the proposed changes to the Council's settlement hierarchy and the options proposed for reviewing this. Whilst it is understood that this 'Issues and Options' consultation document does not propose specific sites for new development at this stage, these representations do refer to Land at Wyndhurst Farm, which has been submitted as part of the Council's 'Call for Sites' and which would make a valuable contribution to 'non-strategic' growth over the plan period.</p>	<p>Cullen Wyndhurst Farm call-for-sites-response-form.pdf (359 KB)</p> <p>Cullen Appendix 2 W of Wyndhurst Farm.pdf (198 KB)</p> <p>Cullen Appendix 1, land e of Stock Lane.pdf (140 KB)</p>
Aston	Aston and Co UK	<p>North Somerset Residential Land Survey April 2018 Headline Findings</p> <p>Average annual completions over the 37 year data period is 892 dwellings per annum (dpa) and Peak completions of 1,464 dpa was achieved in 2007/08.</p> <p>To suggest that on this evidence over the last 8 years an average annual development rate of 1,634 dpa will be achieved is unrealistic.</p>	

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		<p>During the examination of the extant site allocations plan, the subject of persistent under delivery of new housing against target was debated and as a consequence the Inspector sought to increase the identification of land for housing by 2,500 units. This was not accomplished and needs to be addressed to correct a persistent undersupply within North Somerset.</p> <p>In the light of the updated GPDO (2015), more positive support for the conversion of rural buildings to alternative uses, including residential, should be included in the new replacement plan policy to encourage housing being brought forward from this supply source.</p> <p>The annual supply of housing for the last 8 years of the plan is predicted at 1,634 completions per year (page 2, last para), the 5-year supply requirement with 20% buffer is 1,950 dpa. NSC needs to focus on identifying smaller sites adjacent to the larger settlement boundaries that can be brought forward swiftly to meet demand. Portishead will soon benefit from investment in improvements in highway connectivity to Junction 19 and the Metro West rail link to Bristol. The land at Black Rock (SHLAA Ref: HE18124) has confirmed infrastructure capacity available.</p> <p>Collectively, such sites could bring forward significant housing supply without the long lead times of projects such as the garden villages and with far less environmental effects. That would provide sustainable housing delivery.</p> <p>NSC predicts an existing 4.5 year housing supply (page 9). Additional land needs to be identified and allocated to help address the housing crisis and a significant period of undersupply. The dismissal of so many land parcels at the outset of the review process does not meet national guidance and will not achieve the optimum outcome.</p> <p>The emerging housing requirement data on page 10 is used to predict a 5.2 year supply based on the emerging JSP requirement. From the evidence provided by Industry during the examination of the extant Site Allocations Plan in 2017, that figure is likely to be disputed and is not agreed.</p>													
C Twine		<p>WEST OF ENGLAND JOINT SPATIAL STRATEGY OVERVIEW</p> <p>The current IOP is predicated on the submission version of the JSP which identifies a need for 102,200 new homes across the Plan area and the expectation that North Somerset will deliver some 25,000 homes. Of which only 1,000 dwellings has been allocated to non-strategic growth.</p> <p>As we and many others (including the Home Builders Federation) have suggested this overall requirement for the JSP area and that attributed to North Somerset is too low. This under estimation can be attributed to three inter related issues:</p> <ul style="list-style-type: none"> • Addressing housing affordability; • Low economic growth assumptions; and • Lack of adjustment to meet significant affordable housing needs. <p>Although the JSP is being examined against the requirements of the National Planning Policy Framework (NPPF, 2012), the new standardised methodology for calculation of local housing need based on household projections and housing affordability makes for interesting comparison. It is of note that the standard method achieves only a minimum housing need figure and further uplifts may be considered necessary.</p> <p>The standard method results in the following outcomes:</p> <table border="1"> <thead> <tr> <th>Authority</th> <th>1 Year Requirement (dwellings)</th> <th>20 Year Requirement (dwellings)</th> </tr> </thead> <tbody> <tr> <td>Bath & North East Somerset</td> <td>657</td> <td>13,138</td> </tr> <tr> <td>Bristol</td> <td>2,440</td> <td>48,802</td> </tr> <tr> <td>North Somerset</td> <td>1,338</td> <td>26,760</td> </tr> </tbody> </table>	Authority	1 Year Requirement (dwellings)	20 Year Requirement (dwellings)	Bath & North East Somerset	657	13,138	Bristol	2,440	48,802	North Somerset	1,338	26,760	Mrs Catherine Twine.pdf (1.3 MB)
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Chris Butler		This is all seems led by JSP/JTS (aka Bristol/Bath expansion) Will anyone in NSC question the actual need for the housing build numbers based on old data dictated by central government? Isn't this all really just about supporting the house building industry as a major employer and LPA's gaining New Homes Bonus to top up their Council Tax revenue for social care? Shouldn't the real objective be population control? Council Housing should never be sold, perhaps shopping centres recently acquired by NSC should be converted to residential council housing as retail sector regresses due to increased online shopping?							
Church Commissioners for England		<p>We write on behalf of our client the Church Commissioners for England, who are long-term landowners in the North Somerset Area. The Commissioners own considerable landholdings across the country and manage a well-diversified investment portfolio to support this. The new Local Plan is being prepared to plan for North Somerset to 2036 and will provide the detailed policies and land allocations including detailed policies on the strategic developments at Nailsea, Backwell, Churchill and Banwell, which have been allocated in the West of England Joint Spatial Plan (JSP). The Commissioners first submitted representations to the Council's Generating Ideas consultation on 13 April 2018.</p> <p>The Commissioners recognise the Councils' extensive efforts in producing its Issues and Options and support its aims in producing a new Local Plan to support the implementation of the JSP. We understand that the purpose of the Issues and Options document is to identify the issues which need to be addressed in the emerging North Somerset Local Plan and to receive initial feedback on a range planning issues, including; local housing growth; settlement boundary reviews; and, the National Planning Policy Framework 2018 (the "NPPF") requirement for small scale sites of 1 ha or less.</p> <p>The Commissioners support the Councils request for feedback on its Issues and Options and are pleased to be given the opportunity to comment. The Commissioners generally support the allocation of strategic land within the JSP and the aims of the emerging Local Plan to 2036. The Commissioners would, however, like to ensure that the proposed strategic sites do not become the main focus of the new Local Plan 2036 and that the value of enabling smaller scale developments is also recognised, either through reviewing existing settlement boundaries, or small scale housing allocations.</p> <p>The Commissioners own the following site in North Somerset:</p> <p>Land off the Veale, Bleadon (the site)</p> <p>In support of these representations, please also find the following included within submitted representation pack:</p> <p>Site location plan Illustrative plan, prepared by TFQ Architects Indicative Ecological Mitigation Plan, prepared by The Ecology Partnership</p>	<p>The Veale Site Plan.pdf (56 KB) 17_08_04_Final_Access_Appraisal_The_Veale_Bleadon_17-T078.pdf (1.6 MB) P Mitigation Plan - The Veale.pdf (1.2 MB) 26_SK_01_SketchScheme.pdf (363 KB) The Veale 2017 PEA_DRAFT Issue.pdf (2.0 MB) The Veale BATS_Issue 1.pdf (1.3 MB) The Veale REPTILES_Issue 1.pdf (473 KB) The Veale Bleadon Local Plan 2036 Issues and Options representations 12.12.18.pdf (178 KB)</p>						

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		<p>Phase 1 Habitat Survey Reptile Survey Bat Survey</p> <p>The Site is an infill plot located within the built up area of the village of Bleadon, although it sits outside the Bleadon settlement boundary. It is used for grazing horses and lies approximately 4 miles from the centre of Weston-Super-Mare. The Site is bounded on its northern, eastern and western boundaries by existing housing, and its southern boundary is bounded by a woodland strip which is designated as a Local Wildlife Site. The Site rises to the southern boundary towards the existing tree line.</p> <p>The surrounding area is typified by residential dwellings, which make up the bulk of the settlement of Bleadon. Employment uses in the Village include a concrete paving manufacturer, a flooring contractor, holiday accommodation and agricultural farming operations. Local amenities in Bleadon include the Queens Arms pub and Murco petrol station. Weston General Hospital is located 2.3 miles north-west of the Site and Oldmixon Primary School is located 3 miles to the north of the Site. The Site is not located within a conservation area and there are no listed buildings within close proximity to the Site.</p> <p>Settlement Boundary Review</p> <p>The Commissioners support the Council's commitment within its Issues and Options document to review the Bleadon settlement boundary as part of ongoing development of the emerging Local Plan. The document confirms that a review of the boundaries will be initiated to assess how development needs up to 2036 would be addressed through the Local Plan. The Commissioners submitted a request for pre-application advice in October 2017. The Officers response noted the Site's location outside of the Bleadon settlement boundary and the restrictions this places on its development. This was the primary focus of the Council's pre-application response due to Core Strategy 2006-2026 Policies CS14 'Distribution of New Housing' and 'CS33 Infill Villages, Smaller Settlements and Countryside' restricting development in the designated Infill Villages to that which is within the settlement boundary.</p> <p>The Commissioners strongly urge the Council to develop its Local Plan Policy in line with Option 1 'Adjust settlement boundaries to include new allocations within the boundaries and retain the current policy which allows sites to come forward adjacent to boundary'. Option 1 helps meets the government's pro-growth agenda as it allocates sites plus incorporates flexibility for other sites to come forward at a time when there is a significant under supply of housing. The Council should allow some flexibility for new development adjacent to settlement boundaries in Infill Villages where it can be demonstrated that the site is sustainable to ensure that new development can be considered appropriately on a case by case basis. This will avoid discounting sustainable development through restrictive Local Plan policies.</p> <p>The Commissioners consider that there should be flexibility within the emerging Local Plan to enable appropriate sustainable small scale development sites such as in Bleadon, across the whole of the Council's settlement hierarchy. This Policy is particularly restrictive for Infill Villages such as Bleadon and is preventing suitable, sustainable, high quality development from coming forward.</p> <p>Requirement for Small Scale Sites</p> <p>The Commissioners are pleased to note that the Councils' Issues and Options document correctly identifies that Paragraph 68 of the revised National Planning Policy Framework (the 'NPPF') (published July 2018) requires that at least 10% of all sites identified for housing in Local Plans are 1 ha or less. As noted in the NPPF, small-scale sites can make an important contribution to meeting the housing requirement of an area whilst also benefiting from being able to be built out quickly. There is an increasing acceptance amongst LPA's that to maintain a five year supply there is difficulty in relying on larger and longer term developments. Therefore, the Commissioners request that the Council acknowledges the small scale site requirements of the NPPF within the new Local Plan, and sets out the benefits of smaller sites in helping maintain a five year housing land supply.</p>	

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		<p>The revised NPPF and the Housing White Paper – "Fixing our Broken Housing Market" recognise that small sites create opportunities for developers and will help meet rural housing needs which are sensitive to their setting. One of the key aims of the Government is to diversify the housing market and open it up to smaller builders who will naturally focus on smaller sites. Smaller sites can make a valuable contribution to housing numbers and can be well designed to be in keeping with the surrounding area.</p> <p>The Commissioners understand that the Council does not currently have a demonstrable five year housing land supply (September 2018 Appeal, Ref. APP/D0121/W/18/3200907). The Site is available to develop immediately and can make a valuable contribution to the Council's objectively assessed housing need. It is entirely within the ownership of the Commissioners and is capable of being brought forward quickly to assist in the delivery of new housing for the district if the settlement boundary is reviewed to amend Bleadon's built-up envelope to include the Site.</p> <p>Ecology</p> <p>A key issue with the Site is its allocation as a Local Wildlife Site. This has prevented the Site being allocated in the past and was raised as a potential issue during previous pre-application discussions.</p> <p>The Commissioners received pre-application advice in relation to the Site in January 2017. The response concluded that the ecologically sensitive south of the Site was required to be protected and that a net biodiversity gain would need to be demonstrated. To accommodate ecological mitigation and enhancements of the Site the Commissioners reduced the number of dwellings to accommodate the mitigation buffer on the Site's southern boundary. The Commissioners have since undertaken further ecological survey work at the Site which demonstrates that impacts on the Local Wildlife Site can be mitigated and that a suitable buffer can be incorporated and confirm that a biodiversity net gain for the Site is achievable.</p> <p>Suitability</p> <p>It should be noted yet that the Commissioners are actively working towards bringing the Site forward for development. It is located within a sustainable location which abuts the settlement boundary. It is protected by heavy screening to the south of the site and residential units to the north, east and west. The majority of Bleadon's local amenities are located within Bleadon's central and eastern extent, and as such, it is the most sustainable plot in the Village for new residential development.</p> <p>The Site is approximately 0.9ha and can accommodate at least 12 dwellings, which will assist in the delivery of new homes for the Council.</p> <p>The Commissioners have undertaken a number of surveys to demonstrate that the Site is suitable for development.</p> <p>The accompanying reports confirm that the Site is suitable for a sensitive residential development of approximately 12 units. Any future residential development of the Site should be positioned to reflect the layout of the surrounding existing dwellings to ensure that the overall layout and design responds positively to local context and character of the area. Initial feasibility studies to determine the development capacity of the Site demonstrate that it has capacity for 20 residential dwellings, however, once the requirement for ecological mitigation is taken into account this is reduced to 12 units, shown on the accompanying Mitigation Plan.</p> <p>Transport</p> <p>An access appraisal has been undertaken which confirms that suitable access to the site can be provided by extending the existing access from the Veale. This was confirmed in the pre-application response.</p> <p>Conclusion</p> <p>The Commissioners are pleased to have the opportunity to provide comments in relation to the North Somerset Local Plan Issues and Options 2036 consultation. The Commissioners are supportive of the key principles of the document and would request that the council consider that Bleadon settlement boundary be extended to include the site so it can forward as a sensitive residential development. The site would make a valuable contribution to the supply of housing in the district and help deliver on the</p>	

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		Council's requirement, under the NPPF, to achieve 10% of its housing allocations on sites on 1ha or less. The accompanying surveys demonstrate that the proposed land use would be designed to not give rise to any ecological and residential amenity issues and would be an appropriate use in the existing settlement, with suitable access.																			
Cleeve Parish Council	Cleeve Parish Council	CPC believe that there is no recognition within North Somerset Council that Bristol City is the main driver of the economy within the area. Although we agree with the key issues identified, the main challenge will remain out-commuting. The NSC goal of self-containment over many years simply hasn't worked. Out-commuting affects the road network and the communities who live along it. The Local Plan should identify housing sites closer to Bristol City.																			
EWH	Edward Ware Homes	<p>3. WEST OF ENGLAND JOINT SPATIAL STRATEGY OVERVIEW</p> <p>3.1 The current IOP is predicated on the submission version of the JSP which identifies a need for 102,200 new homes across the Plan area and the expectation that North Somerset will deliver some 25,000 homes. Of which only 1,000 dwellings has been allocated to non-strategic growth.</p> <p>3.2 As we and many others (including the Home Builders Federation) have suggested this overall requirement for the JSP area and that attributed to North Somerset is too low. This under estimation can be attributed to three inter related issues:</p> <ul style="list-style-type: none"> • Addressing housing affordability; • Low economic growth assumptions; and • Lack of adjustment to meet significant affordable housing needs. <p>3.3 Although the JSP is being examined against the requirements of the National Planning Policy Framework (NPPF, 2012), the new standardised methodology for calculation of local housing need based on household projections and housing affordability makes for interesting comparison. It is of note that the standard method achieves only a minimum housing need figure and further uplifts may be considered necessary.</p> <p>3.4 The standard method results in the following outcomes:</p> <table border="1"> <thead> <tr> <th>Authority</th> <th>1 Year Requirement (dwellings)</th> <th>20 Year Requirement (dwellings)</th> </tr> </thead> <tbody> <tr> <td>Bath & North East Somerset</td> <td>657</td> <td>13,138</td> </tr> <tr> <td>Bristol</td> <td>2,440</td> <td>48,802</td> </tr> <tr> <td>North Somerset</td> <td>1,338</td> <td>26,760</td> </tr> <tr> <td>South Gloucestershire</td> <td>1,402</td> <td>28,030</td> </tr> <tr> <td>West of England Total</td> <td>5,836</td> <td>116,730</td> </tr> </tbody> </table>	Authority	1 Year Requirement (dwellings)	20 Year Requirement (dwellings)	Bath & North East Somerset	657	13,138	Bristol	2,440	48,802	North Somerset	1,338	26,760	South Gloucestershire	1,402	28,030	West of England Total	5,836	116,730	
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West of England Total	5,836	116,730																			

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		<p><i>Table 1 – West of England Summary Standard Method Requirements</i></p> <p>3.5 By consequence if the JSP's figures are too low and North Somerset's apportionment then any North Somerset Plan will be seeking to deliver numbers which are not accurate. Transport Infrastructure</p> <p>3.6 Equally, we are also concerned by the significant reliance upon a series of strategic development locations (particularly Banwell and Churchill) given the overall cost of delivering the associated transport programme. The Transport Topic Paper 8 (WED007) indicates that the total cost to deliver the transport works for the SDL's is estimated to be between £1-1.4 billion and this would be "an ambitious programme and would represent a step-change in the level of investment from that achieved in the last two decades". For the Banwell and Churchill components this is estimated as being between £180-185 million.</p> <p>3.7 As the Topic paper makes clear "in most cases, it is anticipated that the transport schemes will be completed either in advance of or during the early phases of housing build-outs in the relevant SDL's". Such a conclusion is not surprising given the standard of existing infrastructure and its ability to accommodate major strategic growth.</p> <p>3.8 Whilst, we do not object to the Councils pursuing ambitious programmes of work we remain sceptical that all works will receive funding (and it is understood none benefit from committed funding at present) and even if they are funded the associated timescales are likely to be significantly longer and therefore implementation and build outs will be significantly longer than currently envisaged and by consequence delivery of residential units will be over a much longer time horizon than currently anticipated i.e. all units complete by 2036 (except 125 dwellings).</p> <p>3.9 It is our position therefore that the total requirement flowing out of the JSP will increase as will North Somerset's contribution and that the Council should reduce its dependency on infrastructure heavy strategic development locations within this plan period. As a result, we consider the distribution for non-strategic development locations should increase and sites such as that controlled by my client should be actively considered.</p>	
First Step Homes	First Step Homes (Wessex) Ltd	<p>We write to you in respect of the request for representations on the proposed Local Plan 2036 Issues and Options Document. Below we set out some of our comments on the draft Plan.</p> <p>It is our view the emerging Joint Spatial Plan's proposed approach for four Strategic Development Locations in North Somerset to be the main contributors for future growth is flawed.</p> <p>Furthermore, consultation on North Somerset Local Plan 2036 ahead of the Independent Examination of West of England Joint Spatial Plan is premature. The Inspectors have identified significant flaws in the strategic approach taken to the JSP, where SDLs have been promoted without adequate consideration of environmental considerations such as transport and ecological impacts.</p> <p>A more pragmatic vision focused on strategic and non-strategic development provided in locations where existing transportation infrastructure can be improved and optimised more cost effectively – rather than a reliance on ambitious new infrastructure – will de-risk the process of enabling new strategic development and is therefore more likely to be deliverable.</p> <p>Development of less environmentally sensitive land in and around existing settlements (including Ashton Vale) would prevent the need for large scale development that has been demonstrated to adversely impact the North Somerset and Mendip Bats Special Area of Conservation.</p> <p>Multiple allocations dispersed around the district bringing forward a greater number of sites would not create concentrated impacts or require such wide scale mitigation as those strategic sites currently identified within the JSP. This would also reduce the reliance on the strategic sites,</p>	<p>207_NSC_LP_Response_Backwell.pdf (475 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>especially their delivery timescales, whereby non-strategic sites can be delivered within the Plan period.</p> <p>We therefore consider this to be a more logical, sustainable and deliverable approach, with less environmental impact, where the council could allocated multiple non-strategic sites (including previously developed land as well as Green Belt sites, where appropriate) at accessible locations with good links to existing settlements, which would not be based on new significant highway and public transport infrastructure being in place to support it.</p>	
Gallagher Estates (represented by Barton Willmore)	Barton Willmore	<p>Joint Spatial Plan</p> <p>Draft Policy 1 of the JSP proposes a housing requirement of 102,000 homes between 2016 and 2036, while making provision for a supply of 105,500 homes. Policy 1 then distributes this supply between each local authority, with 25,000 homes allocated to North Somerset.</p> <p>It is within this context that North Somerset are preparing their local plan review.</p> <p>We have several fundamental concerns with the draft JSP, which we have summarised below:</p> <ul style="list-style-type: none"> i) It does not meet the full objectively assessed housing need for the West of England. Our assessment of housing need is that at least 140,000 homes are required before 2036; ii) It does not meet the affordable housing needs of the West of England, nor those that identified based on the draft JSP's 102,000 housing requirement figure; iii) It fails to deliver sustainable patterns of development; iv) There is significant uncertainty as to whether the proposed SDLs will meet the JSP's housing requirement, particularly those SDLs proposed at Banwell and Churchill in North Somerset. <p>Local Plan – Housing Provision</p> <p>While we support the preparation of a joint plan across the West of England (WoE), the draft JSP fails to plan for enough housing for the region. As drafted the JSP requires a housing requirement for North Somerset of only 25,000 homes to be delivered by 2036, this equates to 24% of JSP's 105,500 home supply.</p> <p>Evidence shows that the real Objectively Assessed Housing Need (OAN) for the WoE requires the provision of at least 140,000 homes by 2036. If the real OAN were distributed in the same manner, this would give rise to a housing requirement of approximately 35,000 homes for North Somerset.</p> <p>Gallagher Estates object to the Local Plan's housing provision of 25,000 homes and consider it should, therefore, make provision for a minimum of 35,000 homes.</p> <p>The level of housing provision currently proposed by the councils does not reflect the JSP's ambitious vision for economic growth nor does it address housing pressures and the significant affordability issues as identified in the draft JSP.</p> <p>North Somerset shows no ambition to address the significant housing pressures, issues of affordability and need for affordable housing in the district. In fact, the I&O document makes no mention of the significant and acute affordable housing need that the residents of North Somerset district face.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>We consider the level of housing and subsequently the spatial strategy proposed in the I&O document to be unsound and inconsistent with national policy; namely, paragraphs 11 and 35 of the National Planning Policy Framework (NPPF) which require the New Local Plan to be positively planned and meet the development needs of North Somerset.</p>	
Gladman Developments Ltd	Gladman Developments	<p>The development plan for North Somerset comprises:</p> <p>Context</p> <ul style="list-style-type: none"> ◦ • The North Somerset Core Strategy 2026 (re-adopted January 2017); • • The Sites and Policies Part 1: Development Management Policies (adopted July 2016); and • • The Sites and Policies Part 2: Site Allocations Plan (adopted April 2018). <p>Gladman supports North Somerset Council’s decision to commence work on a new Local Plan. This will ensure that planning policy remains up-to-date and is effective in addressing local development needs and issues.</p> <p>The Council previously published a ‘Generating Ideas’ consultation document in November 2017 which Gladman submitted representations to in January 2018. The new Local Plan will provide detailed policies and additional housing, employment and other land allocations beyond 2026 up to the new 2036 end date (which will be aligned with the West of England Joint Spatial Plan).</p> <p>However, Gladman are a little concerned in relation to the timing of this present consultation as it is considered somewhat premature pending the outcome of the examination of the West of England Joint Spatial Plan (WoE JSP). It is inappropriate for North Somerset Council to conduct a consultation when some very significant issues have yet to be addressed through the JSP’s formal examination and there is additional work in support of the Plan which is currently out for public consultation until 7th January 2019.</p> <p>The Council has simply taken everything included within the JSP associated with North Somerset on the premise that it will be deliverable and it anticipates that future the identified residential, employment and highways infrastructure allocations will all come forward as presently planned.</p> <p>The four authorities who comprise the WoE JSP have recently undertaken additional work in relation to the Sustainability Appraisal, Habitats Regulations Assessment, Viability and other additional technical work (including transport) in response to the areas of consideration set out in the Inspectors second letter to the authorities. The West of England local authorities have published a number of additional documents which are currently subject to public consultation from the 12th November 2018 - 7th January 2019. It is not anticipated that the examination of the WoE JSP will commence until mid-2019 at the earliest.</p> <p>Paragraph 35 of the revised National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound:</p> <p>Plan Making</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>statement of common ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.</p> <p>1.2.8 Whilst the present consultation marks a relatively early stage in the plan making process, a potential strategy for the future development of North Somerset is now emerging. It is therefore essential that these tests are carefully considered from the initial stages of local plan production.</p> <p>National Planning Policy Framework</p> <p>On 24th July 2018, The Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework (NPPF2). This publication forms the first revision of the National Planning Policy Framework since 2012 and implements changes that have been informed through the Housing White Paper, the Planning for the Right Homes in the Right Places consultation and the draft revised National Planning Policy Framework consultation.</p> <p>The NPPF2 makes clear that Local Plans that are currently under preparation will need to move towards the use of the standard method for calculating housing needs, unless submitted for examination before 24th January 2019. This Plan is not anticipated to be submitted for examination until September 2019 at the earliest (source: Local Development Scheme – April 2018). The NPPF2 is material to plan making, and all plans submitted for examination after 24th January 2019 will be assessed against the tests of soundness as set out in Paragraph 35 of NPPF2. NPPF2 provides an updated position to the national approach to planning.</p> <p>Within the NPPF, great emphasis is placed on securing the delivery of the right type of housing in the right location in response to assessed needs. This is a reflection of the Government’s ambition to deliver 300,000 dwellings per year within England, and objectives to improve house price affordability and access to home ownership for all groups. It is important to note that whilst the standardised methodology to assess housing needs has been introduced, it is likely that this will be subject to further change.</p> <p>What is unclear is how the North Somerset Local Plan will be progressed in light of the fact that the JSP is not based on the Standard Methodology whereas the North Somerset Plan will need to be as it will be submitted after the 24th January 2019 deadline date.</p> <p>The Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG confirms that the NPPF2 expects LPAs to follow the standard method for assessing local housing needs, and that the standard method identifies a minimum housing need figure, not a final housing requirement. Whilst the PPG advises that the standard method is not mandatory, there is an expectation that other methods will be used only in exceptional circumstances.</p> <p>The PPG outlines examples of where an uplift in the housing requirement may be appropriate, including where growth strategies are in place, for example where Housing Deals exist, where strategic infrastructure is planned that would support new homes, or where an authority has agreed to take unmet need as set out in a Statement of Common Ground.</p> <p>National Planning Policy Guidance</p> <p>The PPG also states that authorities should consider past delivery rates and previous assessments of need, when identifying whether the standard method provides a true reflection of the demand and need for housing within the local area. Both of these factors may suggest a requirement to plan for a higher level of housing than the standard method anticipates.</p> <p>MHCLG published a ‘technical consultation on updates to national planning policy and guidance’ on 26th October 2018 outlining possible changes to the NPPF. The consultation closed on the 7th December 2018.</p> <p>Paragraph 19 of the consultation document proposes that the standard method will be amended for the short-term, until such time as it is reviewed through the publication of new household projections. Paragraph 20 confirms that any proposed changes would apply from the day of publication of revised planning practice guidance.</p> <p>In North Somerset, the adopted Core Strategy annualised requirement of 1,049.25 dwellings per annum will remain as the annualised housing target until January 2022 or when the emerging North Somerset Local Plan 2036 is adopted. If the emerging Local Plan is not adopted by this time, North Somerset will be subject to the standard method figure.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Paragraph 42 of the consultation document also proposes an amendment to paragraph 177 relating to the presumption in favour of sustainable development where Appropriate Assessment is required.</p> <p>There is no timescale available as to when the amendments set out within the consultation document will be made but it is anticipated to be in place in Q1 2019, subject to the comments received from respondents to the consultation.</p> <p>MHCLG Consultation Document</p> <p>The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination, the 2013 Mid Sussex Core Strategy Examination and the 2016 St Albans Local Plan Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption or withdrawal of the Plan.</p> <p>Whilst Gladman recognises that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the PPG, it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, North Somerset Council must be able to demonstrate that they have engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues. This is not simply an issue of consultation but a question of effective cooperation.</p> <p>The need to positively plan to meet full housing, development and infrastructure needs across neighbouring local authority areas should not be underestimated. It is all too easy for the duty to cooperate to be seen as an administrative exercise, however the fundamental social and economic need to ensure a supply of land for good quality housing and employment uses to meet requirements across a wider area is a key issue that must be addressed appropriately through the plan making process. Whilst it may be the case that a local planning authority has sought to work positively with its neighbours, the extent to which a plan tackles strategic priorities that arise from that strategic cross-boundary working and its associated evidence base are issues to be explored and considered from an early stage in the plan making process and ultimately in assessing the soundness of the Local Plan. Important cross-boundary issues should not simply be deferred for consideration at a later date.</p> <p>LEGAL COMPLIANCE</p> <p>Duty to Cooperate</p> <p>In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in local plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.</p> <p>ACHIEVING SUSTAINABLE PATTERNS OF DEVELOPMENT</p> <p>Overview</p> <p>The North Somerset Local Plan 2036, as currently drafted, is to follow the outcome of the WoE JSP and plans to deliver the strategy set out in the Spatial Plan as well as setting a local context including local housing and employment allocations. The Local Plan outlines on page 4 that the distribution of the approximate 25,000 new homes to be delivered over the plan period 2018-2036 will be as follows:</p>	

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		<ul style="list-style-type: none"> ◦ Existing Commitments – 13,932 (to 2036) ◦ Small site windfall – 1,300 (130 per annum 2026-36); ◦ Strategic development locations: <ul style="list-style-type: none"> Backwell -> 700 Banwell -> 1,900 Churchill -> 2,675 (+125 post 2036) Nailsea -> 2,575 (+725 post 2036) ◦ Urban living – 1,000 ◦ Non-strategic growth – 1,000 ◦ Total – 25,082 <p>Gladman have been critical of the housing requirement which has been set out in the submission version of the WoE JSP. The individual housing requirements for each of the four local authorities has yet to be examined by the Inspectors and it may be the case that North Somerset has to plan for additional growth to what is currently planned for above.</p> <p>It is Gladman’s opinion that the housing requirement set out in the JSP is significantly below the full housing need for the area which stems from a very conservative approach to tackling housing affordability and low economic growth assumptions when compared with past performance. This issue is set out in full in Barton Willmore’s response to the JSP on the housing requirement on behalf of the development consortium.</p> <p>The sites that the Local Plan 2036 allocates will need to provide the house building industry and prospective house purchasers with a choice of size and locations to ensure that local housing needs are met and that a five-year housing land supply can be achieved and maintained. A reliance on the strategic sites in isolation will inevitably result in delivery falling behind the required rate.</p> <p>The strategic development location sites identified in the JSP must be thoroughly tested to ensure that they are deliverable, viable and are located in areas which are or can be made sustainable. As an example, the Banwell Garden Village seeks to deliver 1,900 homes but requires a new junction on the M5 and a link to the A38 including the Banwell bypass. This, along with the other requirements set out in the consultation document, appear to call into question the potential viability of the whole scheme at its current size. This will need to be rigorously tested through the WoE JSP examination to ensure that sites are actually deliverable.</p> <p>It is considered, that if both the JSP and Local Plan require significant improvements to infrastructure provision to facilitate the delivery of the Banwell Garden Village and improve the current infrastructure issues associated with this area, then additional, smaller scale sites will have to be brought forward in the key settlements along the A38 corridor such as at Banwell, Churchill and Langford to deliver housing in the shorter term. This will assist the Council in generating the level of infrastructure investment required to deliver the Council’s key infrastructure priorities for this area.</p> <p>The JSP and NSLP also need to make certain that the lead-in times and delivery rates on the strategic sites are robust and realistic to ensure that housing supply from these sites comes forward as predicted by the housing trajectory. If not, this will result in a shortfall in the housing supply, particularly in the early years of the Plan. Therefore, the Local Plan will have to build in sufficient flexibility, through the site allocations and associated policies, to fill the gap. North Somerset have historically struggled to maintain a five-year housing land supply and currently acknowledge that they cannot demonstrate a housing land supply citing, 4.4 years in their recent Residential Land Survey report (October 2018). Therefore, the issue of flexibility in the housing supply is even more critical as highlighted by the Inspector to the North Somerset Site Allocations Plan.</p> <p>If any of the strategic sites set out in the JSP are ultimately found to be unsound, then this will result in additional site(s) which need to be found, either of a strategic nature or potentially smaller sites as replacements. The NSLP will therefore have to closely monitor the examination of the JSP and have built in flexibility to react swiftly to any changes which may occur.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Ultimately, the NSLP will have to fully reflect the strategic direction of the JSP whilst ensuring that it is a deliverable plan which is suitable for providing for the needs of the local population with sufficient housing sites in the smaller settlements to meet local need.</p> <p>As set out in our representations to the West of England Plan Publication Document (June 2017) and the 'Generating Ideas' (January 2018) consultations, Gladman consider that the Strategic Development Locations identified in the Plan do not seem to follow the evidence base as the most appropriate and sustainable locations for growth.</p> <p>When specifically considering the Strategic Development Locations which require Green Belt release, Gladman question whether the Plan has been positively prepared and is justified given the available evidence suggesting more appropriate Green Belt release options, which would impact less on the integrity of the Green Belt, above the chosen spatial strategy.</p> <p>Strategic Development Locations</p> <p>As set out in our representations to the West of England Plan Publication Document (June 2017) and the 'Generating Ideas' (January 2018) consultations, Gladman consider that the Strategic Development Locations identified in the Plan do not seem to follow the evidence base as the most appropriate and sustainable locations for growth.</p> <p>When specifically considering the Strategic Development Locations which require Green Belt release, Gladman question whether the Plan has been positively prepared and is justified given the available evidence suggesting more appropriate Green Belt release options, which would impact less on the integrity of the Green Belt, above the chosen spatial strategy.</p> <p>Gladman welcome the realisation that Green Belt release will be required to deliver a sustainable strategy for the West of England and supports the rational that exceptional circumstances exist to make changes to existing Green Belt boundaries.</p> <p>However, the locations chosen for release from the Green Belt through the JSP should follow the evidence base and be located where sustainable transport links into Bristol exist or can be viably funded through the development process.</p>	
Hayes Family and Mr Cope		<p>ISSUES AND OPTIONS CONSULTATION – GENERAL COMMENTS</p> <p>NSC published their Issues and Options Document on the 3rd September 2018 for consultation until the 10th December 2018. The New Local Plan (NLP) is required to identify the needs for housing, employment and key infrastructure between 2016 – 2036 following the submission of the WoE JSP for examination in April 2018. The NLP seeks to provide detailed guidance on the sites being considered for development as well as development management policies to ensure they can be implemented effectively.</p> <p><u>Housing Supply</u></p> <p>3.2 Policy 1 of the JSP sets out that NSC is expected to deliver a minimum of 25,000 dwellings over the plan period 2016 – 2036. The Issues and Options Document sets out that it is expected that the housing requirement will be delivered via the following types of supply:</p> <p>TYPE OF SUPPLY NUMBER OF DWELLINGS</p> <p>Existing Commitments 13,932 (to 2026)</p> <p>Small site windfall 1,300 (130 dpa 2026-36)</p> <p>Strategic Development Locations (SDLs)</p> <ul style="list-style-type: none"> - Backwell 700 - Banwell 1,900 - Churchill 2,675 (+125 post 2036) - Nailsea 2,575 (+725 post 2036) <p>Urban Living 1,000</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Non-strategic growth 1,000 Total 25,082</p> <p>We have some concerns over the components of supply, particularly urban living, which we comment on within the questions section of these representations.</p> <p>We also question the 'existing commitments' component of the supply referenced above; given the Inspector's comments on the SAP in relation to the suitability and deliverability of certain site allocations put forward when preparing that DPD, we would suggest that a review of all existing site allocations in the Core Strategy and SAP is undertaken to re-assess their credibility and to provide a firm evidence base on which to progress the Local Plan Review. This will ensure that an adequate supply of housing land is provided up to 2036 and that minimum requirements are met.</p>	
Hoddell Associates (Quinton)	Hoddell Associates	<p>The Council has started preparing the LP based upon the recently submitted version of the JSP, which is expected to have its examination hearing next Spring. As such, the overall housing need for the district has yet to be formally determined and therefore it could be argued that it is premature to prepare the plan without such a formal context. If, for example, the housing need was to increase by a substantial margin then the scope and emphasis for changing existing or proposed policies might require equally substantial changes to what is now being proposed. We must therefore reserve the right to make further comments as appropriate at that stage.</p>	
Home Builders Federation Ltd (S Green)	Home Builders Federation Ltd	<p>The identification of non-strategic growth (residential developments of less than 500 dwellings) of 1,000 dwellings in North Somerset in the West of England (WoE) Joint Spatial Plan (JSP) is based on an under-estimation of housing need. The HBF is supportive of the WoE JSP in providing a strategic planning policy framework for 2016 – 2036 in Bristol City, Bath & North East Somerset (BANES), North Somerset and South Gloucestershire. However as set out in HBF representations to previous WoE JSP consultations there is profound disagreement about the objectively assessed housing need (OAHN) calculation. It is considered that the OAHN for the WoE Housing Market Area (HMA) and individual authorities have been under-estimated. It is considered that the OAHN is greater than 102,200 dwellings (5,110 dwellings per annum) for the HMA and 25,000 dwellings (1,250 dwellings per annum) for North Somerset. This under-estimation arises from overly conservative approaches to improving housing affordability, low economic growth assumptions so the lack of housing itself could become a constraint on economic growth and no "policy on" adjustment to the housing requirement to help deliver affordable housing despite a significant identified affordable housing need. For comparative purposes only between 2016 – 2036 the Government's proposed standardised methodology for the calculation of local housing need based on household projections and housing affordability excluding any uplift to support economic growth results in 116,500 dwellings (5,825 dwellings per annum) for the HMA and 26,160 dwellings (1,308 dwellings per annum) for North Somerset. The establishment of a housing requirement figure based on a correctly calculated OAHN is the fundamental starting point for the new North Somerset Local Plan. The Government's objective of boosting the supply of homes remains (2018 NPPF para 59).</p>	
J Gower-Crane		<p>(9. Potential new policy areas) Site Allocations Plan is accommodating the JSP not necessarily NSC's local need</p>	
J Gower-Crane		<p><u>How the Housing will be met?</u></p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Dr Liam Fox MP Dec 2014 in the House of Commons. In Apr 2012 NSC had a Core Strategy that was adopted and approved by the Planning Inspector, which provided "a revised regional spatial strategy that reflected local needs, infrastructure and objectives, which had a total target of 14,000 houses by 2026 ... The plan was subsequently challenged in the courts by the university of Bristol, which wants to build on green-belt land". The High Court ruled in favour of the university of Bristol. "Had the inspector given adequate reasoning, North Somerset would now be required only to provide 14,000 houses" (Previous regional strategy target of 26,750 was abandoned).</p> <p>In July 2016 CPRE wrote on the new NSC Local Plan "North Somerset needs a period of stability in terms of Strategic Planning and not to be chasing a timetable of a new plan that meets the need of the JSP", we agree. So it seems NSC already has its original 2026 target in hand with 13,932 of the original 14,000 already committed or having planning. So it seems NSC is being asked to build an additional 11,000 for the remaining 10 years as part of the JSP partnership. Then presumably more development will be requested post 2036 for both NSC and JSP. When will the 'growth'/development stop? How do we protect green fields for general well-being, environmental, leisure, farming and future generations? How can NSC ensure that planning permissions are actually built rather than land banking?</p>	
Jan Murray	CALRAG	Please see attached document	O Murray response Dec 2018.pdf (96 KB)
Jan Murray	CALRAG	Churchill and Langford Residents Action Group response to North Somerset Local Plan 2036 Issues and Options consultation. Our full response is given in the attached pdf document.	CALRAG I & O Response 7.12.18.pdf (184 KB)
JC	Weston Hillside and Central Forum	<p>I am a long-time resident of Weston-super-Mare (45 years) and are finding the scale and size of development aimed at North Somerset (particularly WsM) over ambitious and out of proportion for such a relatively small county.</p> <p>We have some gorgeous corridors of green agricultural land dividing places, towns and villages throughout the county soon to be concreted over. I resent this!</p> <p>By 2050 I suspect North Somerset will be akin to a small city than an attractive County! We have a national housing shortage, granted, but also I believe it is being exploited for financial gain rather than social and economic necessity by this Tory Council. Over development is being enacted primarily to swell there dwindling coffers and to meet government financial targets than provide people somewhere to live and work. By 2036 and all these places have been built, what next! Another 25000 homes! When will it stop?</p>	
jerb44		My comment to the JSP is repeated in summary here. The declared housing need has not been broken down such that the local need can be assessed.	
KMH1		<p>I feel that the consultation has not adequately considered other strategic options to address housing needs which avoid huge air pollution and traffic impacts on Bristol. No future jobs or 'Weston Growth Engine' inward investment opportunities area promised. The reality in this situation, without an adequate economic growth plan for Weston, is that people wil travel to work in Bristol.</p> <p>The Ashton Vale should be considered instead of urbanising the northern Mendip edge. The Vale includes such dubious quality Greenbelt land, and esp after the new Link road, that other criteria for strategic decision making like health, environmental, flood, and transport impacts need to be given equal weighting in decision making on place selection as Greenbelt. This will then lead to more sensible and sustainable decisions around where to locate new settlements. Assuming LAs have powers to review Greenbelt in exceptional circumstances, there is nothing more exceptional than this plan to the mid 2030s that could lead to some very unsustainable decisions on place if NSC proceed with saying 'Greenbelt is out of bounds'.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		One simply cannot built out the health, environmental, flood and transport impacts. The housing developments in Churchill and Nailsea will simply shunt the traffic and air pollution issues along to Bristol, and pass / increase flood risk along to the existing ordinary water courses and rhynes, leading to increased surface water flood risks and fluvial flood risks to Congresbury.	
Long Ashton Parish Council	Long Ashton Parish Council	The scale of the required development is likely to be affected by Brexit and may not be as large as currently anticipated.	
Margaret Munro		Provision of major new roads and transport schemes is in fact an admission that the majority of employment will be located away from new housing i.e. in Bristol and Weston. Therefore, why not locate the new housing adjacent to those major employment centres and so reduce vehicle emissions, congestion and preserve the character of rural North Somerset. It would be worth a small, exceptional amendment of the green belt, e.g. as the area known as 'The Vale' to accommodate housing near to major employment & where transport infrastructure is already in place.	
Mead Realisations Ltd		<p>1.5 A number of matters are of concern in relation to the general approach taken by the Council in preparing the Issues and Options as well as specific aspects of the Introduction section.</p> <p>1.6 The Introduction section should properly acknowledge the current policy context for North Somerset which is not fully expressed. The Core Strategy was originally adopted in April 2012 but following a successful legal challenge polices were remitted to the Secretary of State for further examination.</p> <p>1.7 Following a further Examination into Policy CS13, a modification was made to that policy raising the housing requirement to a minimum of 20,985 homes (or 1,049 dwellings per annum). The Inspector at the time recognised the limitations of the evidence base but found Policy CS13, as modified, sound subject to there being a review in the short term based on an up-to-date full objectively assessed need for housing.</p> <p><i>1.8 The Core Strategy (January 2017) confirms at paragraph 1.13 that "In addition to annual monitoring a review of the level of new homes required will take place by 2018." This is also specifically stated within Policy CS13: Scale of New Housing. The supporting text to Policy CS13 states that:</i></p> <p>"3.179 Plan preparation and the determination of the appropriate level for the district housing requirement took place against an uncertain planning context in terms of regional planning, the localism agenda, and the introduction of the Representations to Issues and Options December 2018 NPPF, as well as a severe economic downturn which raised doubts about the robustness of trend-based projections and economic growth assumptions.</p> <p>3.180 The North Somerset housing requirement as set out in the April 2012 adopted Core Strategy was challenged in the courts and remitted back to the Planning Inspectorate for re-examination. As part of the reassessment of the housing requirement the Council undertook a fresh assessment of housing needs within the district.</p> <p>3.181 A new joint Strategic Housing Market Area assessment for the wider housing market area was being carried out at the time that Policy CS13 was being examined. Until this work is completed the Council cannot move forward on the basis of a full objective assessment of housing need as required by the NPPF.</p> <p>3.182 The provisions of this policy should therefore be seen as an interim position pending a review of housing requirements and provision which will be based on the findings of the new SHMA. The policy includes a specific reference to this review.</p> <p>3.183 Other local authorities in the West of England are already committed to a similar approach. To reach a co-ordinated position between the West of England authorities based on the duty to co-operate, it is intended that the new SHMA will be published in June 2015. The processes are already in train to produce a Joint Strategic Planning Strategy by early 2017. This will be a formal development plan document and will, amongst other things, allocate housing provision between the West of England</p>	

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Mead Realisations Ltd		<p>Introduction</p> <p>1.5 A number of matters are of concern in relation to the general approach taken by the Council in preparing the Issues and Options as well as specific aspects of the Introduction section.</p> <p>1.6 The Introduction section should properly acknowledge the current policy context for North Somerset which is not fully expressed. The Core Strategy was originally adopted in April 2012 but following a successful legal challenge polices were remitted to the Secretary of State for further examination.</p>	

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		<p>base are being relied upon. It should not be assumed that those commenting on the new local plan documents have access to the evidence base for the JSP and more importantly should make it clear which documents are relied upon.</p> <p>1.13 It is widely acknowledged across the political spectrum that the UK is in the grip of a housing crisis. Nationally, the average house now costs eight times the average income. Whilst the causes of the housing crisis are complex, at the most basic level, as a nation we have not been building enough homes.</p> <p>1.14 In June 2018 an appeal decision relating to at Weston Business Park, Laney's Drove, Locking, North Somerset BS24 8RA (Appeal Ref: APP/D0121/W/17/3184845) confirmed that the total five year supply of deliverable housing was 8,565 dwellings, or 4.4 years. It would appear that the Council's existing housing policies are not working. In light of this it is disappointing that the Consultation Document has not highlighted the need to build more homes as the key issue facing the whole of North Somerset that the Local Plan must address.</p> <p>1.15 Overall it has been difficult to provide feedback as the Issues Options is being prepared in advance of the adoption of the JSP. Page 4 suggests that the starting point for the North Somerset local plan 2036 is the proposed district apportionment from the JSP although this has yet to be tested at examination. The JSP has been in preparation since 2015. The examination has now been delayed until at least May 2019 and there is no certainty as to when the plan will be adopted. If the North Somerset Local Plan 2036 (NSLP 2036) is to be informed by the JSP it should acknowledge that the document will need to change to reflect any consequential changes to the JSP and specifically the overall housing and employment requirement for North Somerset.</p>	
Mead Realisations Ltd		<p>It is not clear from the Issues and Options document how much non-strategic growth the Council considers will be necessary between 2016 – 2036. The document appears to suggest that the 1,000 new homes will be required in addition to development at the Strategic Development Locations (SDL's) although this should be clarified. The Council should confirm whether the proposed housing figures will be expressed as a minimum or whether another requirement should be applied.</p> <p>The acknowledgement that proportional growth will differ from place to place based on a number of factors is generally welcomed. In accordance with the NPPF 2018 small and medium sites of less than 1ha will be an important aspect of the housing supply and should be encouraged. The Council should however provide evidence to support the suggestion that these types of sites typically achieve 40 dwellings per hectare and are "<i>relatively easier to deliver</i>".</p>	
Mr and Mrs Dobson		<p>Are housing number targets realistic, given that there are so many factors that affect the requirement and delivery. For example there may be a significant impact on immigration from the final outcome of the Brexit negotiations. Currently in North Somerset the Inspector has asked for additional site allocations as a contingency due to that fact that developers are not delivering housing where planning applications have been approved. There is a concern that land will be continually 'banked' by developers. The provision of housing will have a major impact on all aspects of the area and it is important that it is based on sound and continually updated data.</p> <p>Location of developments sometimes appear to be driven by landowners who offer land for development and take advantage of government relaxations in planning requirements to make a financial gain, rather than the selection of the most beneficial locations for the community. The concern is that the well-intentioned positive aspects of the plan will be compromised by these tactics and have an impact on the soundness of any plan.</p> <p>Modifications suggested</p> <ul style="list-style-type: none"> • <i>The housing need should be continually reviewed and take into account census results, the economic climate and developments in central government planning, particularly in relation to Brexit.</i> • <i>Measures should be taken to ensure that agreed developments, particularly on brownfield sites, are implemented and not delayed, to avoid constant requests for further site allocations.</i> 	

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		<ul style="list-style-type: none"> <i>The government must be asked to take account of local issues and not relax planning requirements to the extent that landowners and developers can exploit the rules and develop inappropriate sites that are not compliant with the good intentions of the plan.</i> 	
Nailsea		<p>The requirement for 102,200 houses across West of England while only supplying 82,500 new jobs seems to be flawed as to be able to afford new houses would in most cases require 2 jobs per household. Thus requiring well in excess of 150,000 new jobs. Therefore by simple mathematics the JSP document should fail.</p> <p>However taking the percentage of houses to jobs in the JSP of 80% and applying it to Nailsea means that the houses in Nailsea need to be able to provide only 3400 jobs. This means very few young people and families will be able to move into Nailsea as the cost of housing is too much.</p>	
Newland Homes		<p>A number of comments are raised in relation to the general approach taken by the Council as well as specific aspects of the Introduction section of the Issues and Options document. Overall it has been difficult to provide feedback due to the unknown position relating to the West of England Joint Spatial Plan (JSP) and the lack of background evidence on housing and employment growth which would help be useful context.</p> <p>The Introduction section of the Issues and Options document should properly acknowledge the current policy context for North Somerset which is not fully expressed. The Core Strategy was originally adopted in April 2012 but following a successful legal challenge, policies were remitted to the Secretary of State for further examination.</p> <p>Following a further Examination into Policy CS13, a modification was made to that policy raising the housing requirement to a minimum of 20,985 homes (or 1,049 dwellings per annum). The Inspector at the time recognised the limitations of the evidence base but found Policy CS13, as modified, sound subject to there being a review in the short term based on an up-to-date full objectively assessed need for housing.</p> <p>The Core Strategy (January 2017) confirms at paragraph 1.13 that <i>"In addition to annual monitoring a review of the level of new homes required will take place by 2018."</i> This is also specifically stated within Policy CS13: Scale of New Housing. The supporting text states that:</p> <p><i>"3.178 To assess the performance of the Core Strategy, a separate monitoring framework has been prepared which sets out the key indicators. Where policies are not performing as intended, the AMR will suggest the actions that need to be taken to address the issues. In addition to annual monitoring a review of the level of new homes required will take place by 2018. The requirement for a review in 2018 is set out in policy CS13.</i></p> <p><i>3.179 Plan preparation and the determination of the appropriate level for the district housing requirement took place against an uncertain planning context in terms of regional planning, the localism agenda, and the introduction of the NPPF, as well as a severe economic downturn which raised doubts about the robustness of trend-based projections and economic growth assumptions.</i></p> <p><i>3.180 The North Somerset housing requirement as set out in the April 2012 adopted Core Strategy was challenged in the courts and remitted back to the Planning Inspectorate for re-examination. As part of the reassessment of the housing requirement the Council undertook a fresh assessment of housing needs within the district.</i></p> <p><i>3.181 A new joint Strategic Housing Market Area assessment for the wider housing market area was being carried out at the time that Policy CS13 was being examined. Until this work is completed the Council cannot move forward on the basis of a full objective assessment of housing need as required by the NPPF.</i></p> <p><i>3.182 The provisions of this policy should therefore be seen as an interim position pending a review of housing requirements and provision which will be based on the findings of the new SHMA. The policy includes a specific reference to this review.</i></p> <p><i>3.183 Other local authorities in the West of England are already committed to a similar approach. To reach a co-ordinated position between the West of England authorities based on the duty to co-operate, it is intended that the new SHMA will be published in June 2015. The processes are already in train to produce a Joint Strategic Planning Strategy by early 2017. This will be a formal development plan document and will, amongst other things, allocate housing provision between the West of</i></p>	

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		<p><i>England authorities. By early 2017 therefore the Council will be able to plan for a fully NPPF compliant and West of England agreed housing provision. Policy CS13 will be applied on the basis of that revised figure once it has been adopted. The Council will then need to review and have adopted a replacement plan, whether this be a Local Plan or a review of this Core Strategy, in order to put the requirements of the adopted JSPS into local effect.</i></p> <p>3.184 If for any reason the JSPS has not been finalised the Council will move ahead with a review of the document on the basis of the best information available to it (including the NPPF compliant SHMA). In either case the review will be completed by the end of 2018 with a replacement for this policy being adopted by that time."</p> <p>Paragraph 3.190 of the Core Strategy contains a commitment to review Policy CS13 by the production of a joint development plan by the West of England authorities with adoption by the end of 2018.</p> <p>The above policy context is an important factor in shaping the new local plan and should be properly highlighted. The Introduction section of the Issues and Options document simply suggests (at page 3) that existing plans within the West of England authority area are required to be reviewed and updated alongside the West of England JSP. However, there is no acknowledgement that the review is overdue.</p> <p>Duty to Cooperate</p> <p>Paragraph 24 of the NPPF (2018) states that local planning authorities are under a duty to cooperate with each other. The Issues and Options document makes no reference to this duty and this should be addressed as soon as possible unless the Council considers that it does not relate to the local plan review process. If this is the case this should be explained for the benefit of any doubt.</p> <p>Housing Requirements</p> <p>It is widely acknowledged across the political spectrum that the UK is in the grip of a housing crisis. Nationally, the average house now costs eight times the average income. Whilst the causes of the housing crisis are complex, at the most basic level, as a nation we have not been building enough homes.</p> <p>In June 2018 an appeal decision relating to at Weston Business Park, Laneys Drove, Locking, North Somerset BS24 8RA (Appeal Ref: APP/D0121/W/17/3184845) confirmed that the total five year supply of deliverable housing was 8,565 dwellings, or 4.4 years. It would appear that the Council's existing housing policies are not working.</p> <p>In light of this it is disappointing that the Consultation Document has not highlighted the need to build more homes as the key issue facing the whole of North Somerset that the Local Plan must address.</p> <p>Page 4 suggests that the starting point for the North Somerset local plan 2036 (NSLP 2036) is the proposed district apportionment from the JSP although this has yet to be tested at examination. The JSP has been in preparation since 2015. The examination has now been delayed until at least May 2019 and there is no certainty as to when the plan will be adopted. If the NSLP 2036 is to be informed by the JSP it should acknowledge that the document will need to change to reflect any consequential changes to the JSP and specifically the overall housing and employment requirement for North Somerset.</p> <p>Whilst the Issues and Options consultation document suggests it is directly informed by the JSP the Council has not added relevant evidence to evidence base which supports the proposed need for 25000 homes to 2036. Whilst it is understood that this may have been prepared or the JSP for clarity it should do so. It should not assume that those commenting on the Issues and Options document has access to the evidence base for the JSP and more importantly should make it clear which documents are relied upon.</p> <p>Page 4 of the Local Plan Review suggests that the starting point for the North Somerset Local Plan 2036 (NSLP 2036) is the proposed district apportionment from the JSP although this has yet to be tested at examination. The JSP has been in preparation since 2015. The examination has now been delayed until at least May 2019 and there is no certainty as to when the plan will be adopted. If the NSLP 2036 is to be informed by the JSP it should acknowledge that the document will need to change to reflect any consequential changes to the JSP and specifically the overall housing and employment requirement for North Somerset.</p>	

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		<p>Whilst the Issues and Options consultation document suggests it is directly informed by the JSP the Council has not added relevant evidence to the evidence base which supports the proposed need for 25,000 homes to 2036. Whilst it is understood that this may have been prepared for the JSP, it should also be included for the NSLP 2036. It should not assume that those commenting on the Issues and Options document has access to the evidence base for the JSP and more importantly should make it clear which documents are relied upon.</p> <p>The map at page 8 of the Issues and Options document identifies the constrained nature of North Somerset. This highlights that development will need to be accommodated in less constrained areas wherever possible. This should be the preferred approach but it will be important for the Sustainability Appraisal to consider all reasonable alternative development scenarios.</p>	
P Chedgy		<p>I understand that some 40% of the land in North Somerset is in the GB. I also understand that the overwhelming majority of the rest either comprises flood risk areas or is in the Mendip Hills (AONB). In these circumstances it does seem to me to be quite unreasonable that NSC should be obliged to provide some 2,800 new homes on a very limited area of remaining land and I hope that it has made strong representations to government for relief from this very onerous and inappropriate obligation.</p>	
Pegasus (D Millward)	Pegasus Group	<p>Pegasus Group are instructed by Barratt Homes (Bristol) Ltd to submit representations to the North Somerset Local Plan Issues and Options Consultation Document. The document was published for consultation in September 2018 with representations due to be submitted by the 10th December 2018.</p> <p>What is the Joint Spatial Plan challenge for North Somerset? (Page 4)</p> <p>The current IOP is predicated on the submission version of the JSP which identifies a need for 102,200 new homes across the Plan area and the expectation that North Somerset will deliver some 25,000 homes. Of which only 1,000 dwellings have been allocated to non-strategic growth.</p> <p>As we and many others (including the Home Builders Federation) have suggested, this overall requirement for the JSP area and that attributed to North Somerset is too low. This underestimation can be attributed to three interrelated issues:</p> <ul style="list-style-type: none"> • Addressing housing affordability; • Low economic growth assumptions; and • Lack of adjustment to meet significant affordable housing needs. <p>Although the JSP is being examined against the requirements of the National Planning Policy Framework (NPPF, 2012), the new standardised methodology for calculation of local housing need based on household projections and housing affordability makes for interesting comparison. It is of note that the standard method achieves only a minimum housing need figure and further uplifts may be considered necessary.</p> <p>The standard method results in the following <i>minimum housing requirements for each of the four authorities</i>:</p> <p>Bath & North East Somerset 13,138</p>	<p>Pegasus site off Colliters Way, Highridge.pdf (6.1 MB)</p>

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		<p>Bristol 48,802</p> <p>North Somerset 26,760</p> <p>South Gloucestershire 28,030</p> <p>West of England Total 116,730</p> <p>We consider that the JSP's figures and North Somerset's apportionment are too low. As such, the North Somerset Plan will be seeking to deliver numbers which are not accurate and will need revising upwards.</p>	
R Smith	Walsingham Planning	<p>LVA consider that the Introduction chapter should acknowledge the current policy context for North Somerset, which is not fully expressed. The Core Strategy was originally adopted in April 2012 but following a successful legal challenge polices were remitted to the Secretary of State for further examination. Whilst the remitted polices were eventually found sound and Adopted in January 2017, Policy CS13 committed to a review of the amount of new homes required in the area by no later than 2018.</p> <p>The above policy context is an important factor in shaping the new local plan and should be properly highlighted. The Introduction chapter of the Consultation Document simply suggests (at page 3) that existing plans within the WoE authority area are required to be reviewed and updated alongside the JSP. However, there is no acknowledgement that the review is overdue.</p> <p>Page 4 suggests that the starting point for the Local Plan 2036 is the proposed district apportionment from the JSP, although this has yet to be tested at examination. The JSP has been in preparation since 2015. The examination has now been delayed until at least May 2019 and there is no certainty as to when the plan will be adopted.</p> <p>LVA consider that if the Local Plan 2036 is to be informed by the JSP it should acknowledge that the document will need to change to reflect any consequential changes to the JSP and specifically the overall housing and employment requirement for North Somerset.</p> <p>In general, it is not clear what the evidence base is that has informed the issues and options outlined in the Consultation Document. For example, whilst the Consultation Document suggests it is directly informed by the JSP, NS Council has not identified the relevant evidence, which supports the proposed need for 25,000 homes to 2036. Whilst it is understood that this may have been prepared for the JSP, for clarity it should be made clear which documents from the JSP evidence base are being relied upon.</p> <p>According to Page 7 the Consultation Document has been informed by the 'Generating Ideas' consultation held in November 2017. It would be useful if the Council could provide a summary of comments received including how the issues and options outlined in the Consultation Document respond to issues raised.</p>	
RT Charles		<p>Response to planning consultation</p> <p>The Housing Crisis is a blight that no modern democracy will ultimately tolerate. NSC must understand that restrictions imposed by the planning system, given the growth of the UK population, have resulted in millions of young people being unable to afford a home. Many are forced to stay with their parents, others have little alternative other than to live in ruinously expensive rented accommodation much of which is substandard.</p> <p>The root cause of the Housing Crisis are highly restrictive planning policies, inflexibly enforced and allied to a vociferous culture of NIMBY ism. The new core strategy is an opportunity for NSC to put in place a planning regime that ensures a supply of new homes in sufficient volume to put an end to the housing crisis in North Somerset.</p>	

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		<p>On a national basis it is recognised that only 1% of the land mass of the UK needs to be developed to provide enough houses to solve the housing crisis. This should be relatively straightforward to achieve if planning policies are sensibly revised. I suggest the following;</p> <ol style="list-style-type: none"> 1. redraft all planning policies so they are much shorter and practicable. The current policies should be replaced by a single document of no more than 20 pages. Whilst this would be damaging to vested interests on both sides of the planning fence it would shine a bright light in a place currently inhabited by the suffocating bureaucracy faced by many small developers. If the planning policies were radically simplified, it would make decision making and investing much easier. This will unshackle small developers, enable many more to enter the market and do what they are good at which is building homes. This will help far more bricklayers become house builders. 2. A gigantic advance would be made if NSC simply enforced the building restrictions noted in the introduction to this policy review. Vis, that all development must be prohibited within the ANOB, greenbelt and floodplain unless it is on previously developed land or is required for reasons of national infrastructure. 3. Outside of the ANOB, greenbelt and flood plain, an assessment should be made of all non developed land to assess its use. This should then be used to inform decisions on which of this land is suitable to be built on. There are thousands of acres of such land in North Somerset that without current planning restrictions, can be sensibly developed. <p>As a resident of Bleadon I am astonished that virtually all of the land on the south side of Bleadon Hill has little or no productive agricultural use. It is not in the ANOB or greenbelt. There are large fields here that have not been grazed or had crops (including grass) harvested for the duration of my residency which is 4 years. This land is not underused, it is unused! Probably because it is too far away from local farms to be economically viable. What should happen to this land? Within the context of the Housing Crisis and all that this means, what is the purpose of preserving it? This land and land like it should be used to provide homes for our young.</p> <p>Planning policies should be adjusted to enable the development of land such as this which has acquired protection because of the character assessment ascribed to it even when it is outside of the ANOB. Preserving land for reasons of its perceived aesthetic attributes when so many people have no where decent to live is perverse.</p> <ol style="list-style-type: none"> 4. No further building of dwelling houses should be permitted in the flood plain. It matters not whether the flood plain is classed as A2 or A3 or one of the subdivisions thereof. This is because there is a real danger of a catastrophe occurring in the years ahead. Arguably the largest natural disaster to impact on the UK during the last 2000 years was the flooding on both sides of the Bristol Channel in 30th January 1607. <p>A research paper published in 2007 by Risk Management Solutions (RMS) noted that based on knowledge of maximum possible wave heights, such an event will probably not repeat for 500 to 1000 years. However, this prediction was based on the science around maximum wave heights. There is clear evidence this is unreliable. The RMS report provides an example which occurred on 27th December 1999 following "Windstorm Martin" in the Gironde Estuary on southwestern France at the Blayais nuclear plant. The report notes,</p> <p>".....the storm surge reached one meter higher than had been considered the maximum possible water level at the facility. As a result, the water overtopped the defenses and flooded several meters of the lower level of the facility. Without any internal flood protection system, the water spread over a large network of galleries, damaging pumps and electrical circuits. Although little has been published about what actually transpired through the night of the storm, it is acknowledged that as a result of circuit failures, as well as to the interruption of the external power lines, the four reactors were progressively shut down between 9:00 pm local time on December 27 and 12:30 am local time on December 28.</p> <p>On January 5, 2000, the French Nuclear Safety Authority admitted that there had been a Level 2 Emergency at the site. Although not confirmed, there were rumours that three out of the four primary cooling pumps were lost as a result of short circuits during the surge, and that the operators of the reactors had sent messages to the authorities warning of the potential for an impending catastrophe. On the Bristol Channel, the reactors at Hinkley Point and at Oldbury are also vulnerable to being flooded by extreme water levels higher than anticipated in the design of the facilities. Where accompanied by an intense windstorm, the operations and even safety of these facilities could potentially be significantly challenged by the repeat of a surge with tide event comparable to 1607".</p> <p>Since the RMS report was drafted far more evidence has come to light concerning the future rise in sea levels arising from global warming. The Environment Agency report, "Climate change impacts and adaptation" November 2018, included in its summary the following,</p>	

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		<p>“Unless we take action to reduce greenhouse gas emissions, global temperatures may rise to 4°C above pre-industrial levels by the end of the century. Summer maximum temperatures could rise by up to 10°C in parts of England by the 2080s. Sea levels will rise for decades and centuries ahead. Sea level rise is predicted to be between 0.4 and 1 metre by 2100, and possibly by as much as 4 metres by 2300.”</p> <p>The impact of such a storm surge induced flood on “flood plain” housing in North Somerset would be devastating. NSC should carry out a survey to determine how many homes, businesses and other facilities such as hospitals and care homes will be damaged or destroyed if the 1607 flood was duplicated now or in future when sea levels will be higher.</p> <p>To continue to build on the flood plain given the current state of knowledge would be grossly negligent. Granting planning permission in these circumstances risks exposing NSC to potential claims for damages founded in negligence for loss of life, injury and damage to property. It is also possible to foresee civil or state sponsored actions for corporate manslaughter. All of the knowledge concerning these risks is in the public domain. The NPPF demands this is taken into account.</p> <ol style="list-style-type: none"> 5. In areas of high housing demand more high rise development should be encouraged. It is self defeating to limit the height of developments to those of high rise buildings in nearby areas. I suggest encouraging several developments of skyscrapers, close to a railway station/motorway junction, across North Somerset. This technology has been available for decades. Lets use it. These developments could be made visually interesting and become valuable features of the landscape. Policies which prevent this sort of innovation as “not in keeping” etc should be consigned to the dustbin of history. 6. Much more emphasis should be given to creating developments of modern eco style houses built using modern methods such as ICF wall construction with reinforced grass roofs. These dwellings can be erected far more cheaply and quickly than houses built using traditional methods. Small estates of 4 or 5 houses such as these are likely to be of particular interest to small developers and young families. They blend far more easily into the landscape and are much more resilient to fire and loading from strong winds than more traditional designs. If extreme weather is likely to become a part of our future then so should these houses. 7. Far more “one off” inspirational houses should be permitted in the countryside. A planning officer informed me last year that not one single paragraph 55 house had ever received planning permission in North Somerset. The planning policies which shatter human ingenuity should be torn up and replaced by policies that make it much easier for such houses to be built. 8. The policies restricting development based on settlement boundaries and the heirarchy of developable spaces should be dispensed with until the housing crisis is fully resolved. 	
Sedgemoor District Council	Sedgemoor District Council	<p><i>Sedgemoor District Council</i></p> <p><i>Bridgwater House, King Square</i></p> <p>Bridgwater, Somerset TA6 3AR</p> <p>Tel: 0845 4082540</p> <p>DX: 80619 Bridgwater</p> <p>www.sedgemoor.gov.uk</p> <p>Thank you for the opportunity to comment on the above document. As you are aware, this Council has commented on the emerging Joint Spatial Strategy for the West of England and is supportive of the overall approach to accommodate all of the identified housing needs within the JSP area and more specifically for North Somerset Council to accommodate its growth within their district.</p>	

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		<p>However, both Councils appreciate that this ambition may prove challenging should housing growth increase through the JSP examination process or broad locations prove to be undeliverable. Through our own examination into the Sedgemoor Local Plan both Council's agreed a statement of common ground that identified opportunities for potential joint working and consideration of cross boundary housing issues. This approach will be included within the final version of the local plan.</p> <p>With respect to the Issues and Options report the Council therefore supports the continued approach to accommodating all of North Somerset's growth within the district. It notes the approach to deliver a number of garden villages and new communities as part of the spatial strategy. From a Sedgemoor perspective, the proposed garden village at Banwell is of most interest as it potentially will be delivered as part of a wider transport strategy that might ultimately include a new motorway junction south of Weston-Super-Mare and improved access to Bristol airport.</p> <p>Any such investment in new transport infrastructure will have cross boundary impacts, particularly on the A38 through north Sedgemoor as well as junction 22 of the M5. There may also be impacts on mainline rail services and in particular the initiatives to improve service times between Bridgwater and Bristol. We would ask therefore that all cross boundary issues including transport impacts are fully considered as options are evaluated and taken forward. It is important that any transport assessments consider the A38 corridor and the wider M5 movements at J.22. Sedgemoor is currently finalising a long term transport strategy looking to 2050 and will be happy to share this work to assist with your considerations. Similarly, Somerset County Council and Sedgemoor have made representations and inputs to the current studies assessing the potential for large scale expansion of Bristol airport.</p> <p>In terms of other potential cross boundary issues, the plans approach to the Mendip Hills AONB should where possible be compatible to this Councils policy approach set out in the emerging local plan. The Mendip Hills AONB Unit have provided extensive comments on our policies resulting in some modifications. Our Inspectors conclusions on these matters should be available before the end of the year and therefore will be able to inform your approach.</p> <p>In parallel to the issues and options consultation we look forward to continuing our close working relations and to finalise a statement of common ground. We also look forward to providing any assistance you might require when assessing wider impacts of your plan, particularly around the above transport issues and any alternative housing strategy should that need arise.</p>	
Sheila Tyler		<p>The Local Plan Issues and Options document considers the development of 25,000 new houses in North Somerset, taken from the overall figure of 102,200 homes in the Joint Spatial Plan for four authorities, submitted in April 2018. Of the 25,000, almost 14,000 are already committed, with strategic development locations also proposed in the Joint Spatial Plan taking a considerable amount of this figure. Non-strategic growth sites and small windfall sites account for just 2,300 homes, less than 10% of the Local Plan housing figure. Bearing in mind that the new National Planning Policy Framework requires 10% of sites to be on small sites of less than 1ha, it seems inconceivable that a proposal of this nature would meet this requirement.</p> <p>The figures in the Issues and Options plan and the submitted Joint Spatial Plan are not necessarily those to be taken forward as the likely resultant number of new homes to be provided in the district, largely due to recent changes to the national methodology for calculating housing land and the overwhelming need for increasing the supply of new housing across the country and particularly in areas where affordable housing concerns are significant. North Somerset would certainly fall within this category.</p> <p>As the North Somerset Local Plan has not been submitted to the Secretary of State and will not be submitted prior to January 2019, the assessment for housing numbers should be based on the new methodology, and given that at this time in the future the current consultation to consider the 2014 household projections will be active, there will be a need for a significant increase in the total number of houses to be provided in the new Local Plan for 2036.</p> <p>In light of this, elements of the Local Plan issues and Options document that refer to the need for additional housing sites and locational proposals should be considered with as wide a scope as possible to accommodate new development. We would propose that a full and detailed Green Belt assessment should be undertaken, particularly given that the Green Belt has been in place for over 60 years and as it covers just less than half of the borough it is imperative that growth is distributed around the district rather than focused in those non-Green Belt areas.</p>	

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		<p>Opportunities for smaller-scale Green Belt amendments to accommodate small- to medium-sized developments that could readily amend Green Belt boundaries to provide more sensible settlement boundaries for different locations should be considered within the Green Belt assessment.</p> <p>Proposal for the Local Plan Issues and Options taken forward to submission but proposing no assessment of the Green Belt would not be considered sound given the overwhelming need for new homes in the district. A strategy for the district in the Local Plan should be based on sound evidence and ensure that a full assessment of all land is undertaken with the potential for Green Belt sites being justified within the NPPF in such circumstances as significant housing need during preparation of a Local Plan assessment.</p> <p>I enclose details of our previous submissions to the recently adopted Local Plan, and appreciating these sites were not considered required during the latter stages of that Plan, we would seek a full Green Belt assessment with these sites given consideration along with any other submitted, but also with a detailed assessment of the settlement boundary edges adjacent to the Green Belt. Failure to assess such opportunities increases the need for housing sites and larger strategic areas to be proposed that do not provide housing in the short or short-medium term as they require Masterplanning and site assembly. Both sites proposed in this submission are in a single ownership and readily available for development subject to allocation to change the designation, following obviously a thorough assessment of the site within a wider Green Belt review at this time that we consider appropriate.</p>	
Stewart Johns		<p>You do need to explain why any of these regions need more housing? I thought it was for regeneration but I can't see Churchill needing regeneration. We need school places, sewage and flooding control, public service transport links, stock lane route to Congresbury being sorted out and finally we need jobs in the area. I'm not sure building, literally, 1000s of houses on greenfield sites will help in any of this. It seems remarkable that the "business need" question is just not answered. This would therefore invalidate all options. There just seems to be no business case approach to this and hence everything being done is just unstructured adherence to an invalid policy. As you are under the auspices of HM Treasury you MUST have a signed off Strategic Outline Business Case to proceed to the next step. Could I have that please?</p> <p>I just don't get why you are proceeding down minutiae plans when you haven't even got confirmation or agreement to the big picture. Frankly, it is immoral that arable land is being eaten up by housing that is not required and nothing has been produced to explain the need for it to be done. It feels like this is a virtue signalling exercise by North Somerset councillors and staff. A "look at me central office I'm the best behaved" and "I'm helping the poor you know" and "I'm in charge and I'm winning".</p> <p>I think North Somerset is building more houses, as a percentage, than almost any county in the UK; but for no reason. All the new residents in their £350k plus houses will commute to Bristol and Bath. Everything will be worse not better. North Somerset has, and will, create little or no jobs and beautiful prime fields will be lost for ever. The only beneficiaries are the developers, the land owners and the virtue signalers. The annoying thing is that this has been obviously the case from the start.</p> <p>Please just tell me why in austere times with limited resources you are prioritising a vanity project with no benefits - or at the very least the costs far outweigh any benefits?</p> <p>Also, why are you doing something that is so obviously against the will and wants of the electorate population?</p> <p>On specific points:</p> <ul style="list-style-type: none"> • Several thousand houses in Churchill/Langford needs several thousand jobs. Even theoretically, where are those jobs coming from? • The lower end of Langford is a giant container for water coming down from the hillsides. How on earth are you going to stop this flooding? • In Churchill, under current primary school rules I assume the new residents will have immediate priority on the overcrowded school places. Where are the current residents children going to go to school? Are you building new schools ready for the new residents? I think I read that there are on average 1.1 school age children per average house. Where are the 1000's of new children in Churchill going to go? • I notice no affordable housing in the houses already being built. What proportion in Churchill is affordable? • Currently much housing in Langford is rented by students. When the new houses are complete I believe some people are intending to buy to let. Where do you envisage these students will go to? and what happens to the current rented housing? • The sewage system in Langford is at breaking point at the moment so what is in place to increase capacity? and where will it go? 	

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		<ul style="list-style-type: none"> • Stock Lane has literally already become impassable for much of the day so how will it cope with the new volumes of traffic? It is the only way to Yatton Train station. • Ladymead Lane is now often impassable and the residents (quite rightly) are going to stop drivers using their private drives as pull ins. How is this going to be resolved? <p>I look forward to the answers you must obviously already have but I can't find at the moment. I presume the answers are in your business case, investment appraisals and impact assessments.</p> <p>Stewart</p>	
Taylor Wimpey - The Vale		<p>Q1. Weston-super-Mare</p> <p>1.1. The key issues and suggested approaches in relation to Weston-super-Mare pre-suppose that it is desirable and / or correct to continue to focus growth towards the town through the new Local Plan, in isolation from any nuanced consideration of supply and demand.</p> <p>1.2. As set out in our previous representations (see paragraphs 32 to 40 and 66 to 67 of Appendix 2), based on average annual housing completions (ie the absorption rate) in Weston-super-Mare over the last 10 years 346.2 dwellings per annum and the existing housing supply in Weston-super-Mare (circa 11,500 dwellings in permissions and allocations, excluding the proposed Banwell and Churchill SDLs), there is already sufficient land to maintain existing absorption rates for over 33 years.</p> <p>1.3. Furthermore, despite strategic policy being in place for over 20 years, the balance of jobs to homes in Weston-super-Mare has not resulted in enhanced self-containment. Evidence from commuting flows indicates that a high proportion of households in Weston-super-Mare remain economically dependent upon the Bristol urban area. Therefore even if higher housing absorption rates could be achieved, directing further housing growth (including the proposed Banwell and Churchill SDLs) toward the Weston-super-Mare area is only likely to promote unsustainable patterns of development.</p>	
Taylor Wimpey - Turley Associates	Turley Associates Ltd	<p>Local Plan 2036 Issues and Options Document</p> <p>The Local Plan Issues and Options Document proposes to deliver 25,000 dwellings over the plan period to 2036. This figure is based on the submitted West of England Joint Spatial Plan housing requirement. Taylor Wimpey is part of a consortium of key interested parties that have collaborated to provide a detailed response to the Joint Spatial Plan. This combined response (prepared by Barton Wilmore and submitted by them in January 2018) includes a Technical Report that considers the full Objectively Assessed Housing Need (OAHN) for the West of England and provides an update to previous modelling assumptions based on the latest available data.</p> <p>Topic Paper 1, included within the evidence base for the JSP, sets out that based on this methodology the "policy-off" evidenced need for housing is 102,200 dwellings 2016-2036. The "policy-on" requirement has included some flexibility, as is required by the NPPF, and increased this figure to result in the total identified supply of 105,500 dwellings. However, we would agree with the Consortium assessment that this figure significantly underestimates the housing need in the West of England and that it is based on out of date evidence that has materially changed since the assessment took place. Any increase in the housing requirement will result in the need for a review of strategic development allocations and a higher level of non-strategic development is also expected to be required.</p> <p>In this respect, the emerging Local Plan provides an opportunity to boost significantly the supply of housing. Given that additional housing needs to be identified within the Authority area in order to meet the housing needs identified in the published West of England Strategic Housing Market Assessment, there is a clear need to identify additional sites for residential development in the area.</p>	

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		<p>The JSP housing figure is expressly stated to be a minimum requirement, it would be prudent for the Council to treat this figure as a minimum and ensure that potential delays and non-implementation of sites does not result in the continuation of a lack of five year supply or indeed, under delivery across the plan period. Consequently, in line with the NPPF's requirement to boost significantly the supply of housing and to ensure a five-year supply is achieved and maintained, the Council should be allocating a greater amount than the minimum required in the Local Plan.</p>	
The Baker Family		<p>Our clients interest lies in the Strategic Development Location (SDL) for Nailsea, where it is one off the key stakeholders. The policy context for this proposed development lies within the submitted JSP and relates both to the assessment of the overall housing requirement during the plan period and the distribution of this between the four authorities' districts. Clearly, the LP thus far only reflects this status for the JSP and may be subject to change in due course to correlate with the finally adopted form of the JSP. We reserve the right to make further comments as appropriate at that stage.</p>	
Waddleton Park Limited (Savills)	Waddleton Park Limited	<p>Housing Need and Supply</p> <p>Existing Housing Need and Supply</p> <p>The adopted Core Strategy (January 2017) sets out a housing requirement of 20,985 dwellings over the plan period 2006 to 2026; with this level of growth to be reviewed by 2018. That review process has commenced through the West of England JSP, but has not yet been completed.</p> <p>To date, 9,710 dwellings have been completed over the first twelve years of the plan period, 2006-2018, and as such there remains a requirement for a further 11,275 dwellings to be completed in the next eight years (NSC, Residential Land Survey 2018).</p> <p>The most recent appeal decision considering 5YHLS in North Somerset found a 5YHLS of 4.4years (APP/17/3184845, dated 18 June 2018). This represented a mid-point between the Authority's position (at 5years) and Appellant (at 3.41years). This related to the period 2017-2022, and as such, is now out of date, and the Authority will shortly be publishing an updated 5YHLS assessment.</p> <p>Of particular note, subsequent to this appeal decision, the NPPF (2018) has been published, which sets out a more stringent test for the inclusion of sites within the 5YHLS; in particular where reliance is placed on allocations or sites which benefit from outline planning consent only (see 'Deliverable'; NPPF Glossary). As set out in the published 5YHLS statement, a number of key elements of North Somerset's 5YHLS come from these sources, and as such, their inclusion in the updated 5YHLS assessment will need to be reconsidered in light of the new NPPF.</p> <p>The current position in regard to 5YHLS, and the shortfall to date against the Core Strategy requirement, highlights the importance of maintaining a robust supply of smaller development sites for short-medium term housing supply. This has been emphasised by the Government in recent years, who have confirmed that central to 'Planning for the Right Homes in the Right Places' is "releasing more small and medium-sized sites, allowing rural communities to grow.." (MHCLG, Fixing our Broken Housing Market, February 2017).</p> <p>Emerging Housing Need</p> <p>The submitted JSP includes a housing target of 102,200 units for the period 2016-2026; of which 25,000 are to be directed to North Somerset. This was based upon the West of England Authorities' objectively assessed need (OAN) of 98,000.</p> <p>The JSP is currently subject to objection in regard to the emerging housing requirement, and this will be tested through the Examination process in 2019. A number of alternative OAN assessments have been undertaken, which indicate that the housing need is around 135,000 – 145,000 homes.</p> <p>The Government are bringing forward a new standardised methodology for OAN, and a consultation is ongoing until December 2018. This has confirmed that for now, the 2014-based household projections should be used to provide the demographic baseline, and that the standardised methodology as previously published remains the same.</p>	

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		<p>The MHCLG's calculation of the housing need for North Somerset over the period 2016 to 2036 using the standardised methodology is an annual requirement of 1,305 dwellings (MHCLG, September 2017).</p> <p>The emerging JSP therefore plans for an under-delivery of housing within North Somerset against the standardised methodology: a shortfall of 1,100 units over the 20-year plan period. This doesn't account for any unmet need from the City of Bristol: which against its MHCLG standardised methodology figure will have a significant shortfall of over 10,000 homes over the plan period.</p> <p>The forthcoming JSP Examination will provide clarity on the appropriate housing target for the West of England; and as a result for North Somerset. Given the current uncertainty, we would encourage North Somerset to take a proactive approach in identifying opportunities for development at this early stage of the nLP, to enable flexibility at a later stage to respond to changes in the overall housing requirement.</p> <p>Emerging Housing Supply</p> <p>Page 4 of the Consultation Document sets out how the emerging housing requirement will be met within North Somerset:</p> <table border="1" data-bbox="416 628 947 866"> <tbody> <tr> <td>Existing commitments</td> <td>13,932</td> </tr> <tr> <td>Small site windfall</td> <td>1,300</td> </tr> <tr> <td>Strategic Development Locations</td> <td>7,850</td> </tr> <tr> <td>Urban Living</td> <td>1,000</td> </tr> <tr> <td>Non-Strategic Growth</td> <td>1,000</td> </tr> <tr> <td>Total</td> <td>25,082</td> </tr> </tbody> </table> <p>We raise a significant concern that the proposed housing land supply only provides a surplus of 82 dwellings over the twenty-year plan period; this provides no scope for any sites stalling in the development process or delays in delivery. The housing land supply already includes a windfall allowance (at 1,300 units), in addition to the urban living requirement for a further 1,000 units – both of which are optimistic. As such, there will be limited additional development opportunities over the plan period which would provide a buffer against the housing requirement.</p> <p>A number of objectors to the emerging JSP have raised concerns in regard to the deliverability of the four Strategic Development Locations (SDLs) identified within North Somerset: both in-principle and in regard to their likely housing trajectory over the plan period. We do not reiterate any objections in-principle to the SDLs; recognising that this will be addressed in the JSP. However, the deliverability in terms of the anticipated housing trajectory is material to the nLP, and is critical in ensuring that the nLP allocates sufficient Non-Strategic Growth to meet housing needs over the plan period.</p> <p>The Consultation Document indicates that combined these four SDLs will deliver 7,850 dwellings over the plan period; thus comprising a significant proportion of the housing land supply. However, the Consultation Document also confirms the scale of infrastructure required to support these allocations, and the constraints which will need to be overcome in bringing forward these sites. Whilst these form a central element in regard to the in-principle concerns with the SDLs which will be considered at the Examination of the JSP, should the SDLs proceed, then the scale of the infrastructure, in particular to support the delivery of the two new Garden Villages, is substantive and will thus impact upon the lead-in time to first completions: both in regard to practical delivery of the infrastructure, and also the securing of necessary funding.</p>	Existing commitments	13,932	Small site windfall	1,300	Strategic Development Locations	7,850	Urban Living	1,000	Non-Strategic Growth	1,000	Total	25,082	
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		<p>In addition, these areas do not fully benefit from developer interests, and there are a significant number of landowners whom have yet to confirm their willingness to enter into discussions with any party. The wider infrastructure identified to support these Garden Villages, in particular the two new bypasses, will require further land agreements to be reached.</p> <p>Following the confirmation of land owner interests and securing suitable legal agreements, it would be necessary to undertake a full environmental impact assessment and masterplanning process, then an outline planning consent, potentially the subsequent sale of development parcels, the discharge of all relevant conditions and detailed reserved matter approvals before any construction work could start on site.</p> <p>Research undertaken by Nathaniel Litchfield & Partners (NLP), 'Start to Finish' (2016), investigated the timescales for delivery of large-scale strategic developments. The research concluded that on larger schemes of 2,000 or more dwellings, the average planning approval period was 6.1 years. This process can only be undertaken once the legal interest in the land has been secured.</p> <p>However, the trajectory underpinning the nLP's housing supply figures (JSP Housing Trajectory, April 2018) indicates that housing delivery will commence in 2021/22 (Banwell Garden Village) and 2025/2026 (Churchill Garden Village). Assuming land assembly would take 1-2 years, this leave one year or less to achieve planning consent on the Banwell Garden Village and four years for the Churchill Garden Village; both of which are significantly less than the 6 years identified in the NLP Research.</p> <p>The April 2018 trajectory also indicates that delivery on these new garden villages will reach up to 300 dwellings per annum to deliver the 7,850 dwellings by 2036. This annual delivery is substantial, and we consider these are unrealistic. The above referenced NLP research found that on average the larger schemes (over 2,000 units) delivered fewer than 200 dwellings per annum. The only site which recorded an average annual completion rate above 300 units was Cranbrook, which took a significantly greater lead-in time than anticipated on the two North Somerset Garden Villages, and its delivery was supported by £32million of Government funding to support both its Phase 1 and 2. The delivery of the Weston Villages, allocated in the Core Strategy, has failed to achieve housing completions at these rates with the highest number of annual completions in the last six years at 242 dwellings; with the average at 93 dwellings per annum.</p> <p>As such, in addition to the delay in commencement on these sites, we also raise a concern that once commenced, the annual delivery rates of the SDLs, notably the two new Garden Villages, is unlikely to reach the annual projections within the housing trajectory.</p> <p>In light of the lack of a suitable buffer, with the planned buffer at only 82 dwellings over the 20-year plan period, there will be no flexibility in the housing land supply to allow for delays in commencement or delivery on these strategic sites.</p> <p>To ensure a robust housing land supply over the plan period, and the ability to demonstrate a 5YHLS within the short-medium term, the number of units identified within the nLP as Non-Strategic Growth should be increased.</p>	
Wainhomes		<p>1.4 A number of matters are of concern in relation to the general approach taken by the Council in preparing the Issues and Options as well as specific aspects of the Introduction section.</p> <p>1.5 The Introduction section should properly acknowledge the current policy context for North Somerset which is not fully expressed. The Core Strategy was originally adopted in April 2012 but following a successful legal challenge polices were remitted to the Secretary of State for further examination.</p> <p>1.6 Following a further Examination into Policy CS13, a modification was made to that policy raising the housing requirement to a minimum of 20,985 homes (or 1,049 dwellings per annum). The Inspector at the time recognised the limitations of the evidence base but found Policy CS13, as modified, sound subject to there being a review in the short term based on an up-to-date full objectively assessed need for housing.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>1.7 The Core Strategy (January 2017) confirms at paragraph 1.13 that <i>“In addition to annual monitoring a review of the level of new homes required will take place by 2018.” This is also specifically stated within Policy CS13: Scale of New Housing. The supporting text to Policy CS13 states that:</i></p> <p>“3.179 Plan preparation and the determination of the appropriate level for the district housing requirement took place against an uncertain planning context in terms of regional planning, the localism agenda, and the introduction of the NPPF, as well as a severe economic downturn which raised doubts about the robustness of trend-based projections and economic growth assumptions.</p> <p>3.180 The North Somerset housing requirement as set out in the April 2012 adopted Core Strategy was challenged in the courts and remitted back to the Planning Inspectorate for re-examination. As part of the reassessment of the housing requirement the Council undertook a fresh assessment of housing needs within the district.</p> <p>3.181 A new joint Strategic Housing Market Area assessment for the wider housing market area was being carried out at the time that Policy CS13 was being examined. Until this work is completed the Council cannot move forward on the basis of a full objective assessment of housing need as required by the NPPF.</p> <p>3.182 The provisions of this policy should therefore be seen as an interim position pending a review of housing requirements and provision which will be based on the findings of the new SHMA. The policy includes a specific reference to this review.</p> <p>3.183 Other local authorities in the West of England are already committed to a similar approach. To reach a co-ordinated position between the West of England authorities based on the duty to co-operate, it is intended that the new SHMA will be published in June 2015. The processes are already in train to produce a Joint Strategic Planning Strategy by early 2017. This will be a formal development plan document and will, amongst other things, allocate housing provision between the West of England authorities. By early 2017 therefore the Council will be able to plan for a fully NPPF compliant and West of England agreed housing provision. Policy CS13 will be applied on the basis of that revised figure once it has been adopted. The Council will then need to review and have adopted a replacement plan, whether this be a Local Plan or a review of this Core Strategy, in order to put the requirements of the adopted JSPS into local effect.</p> <p>3.184 If for any reason the JSPS has not been finalised the Council will move ahead with a review of the document on the basis of the best information available to it (including the NPPF compliant SHMA). In either case the review will be completed by the end of 2018 with a replacement for this policy being adopted by that time.” 1.8 Paragraph 3.190 of the Core Strategy also contains a commitment to review Policy CS13 by the production of a joint development plan by the West of England authorities with adoption by the end of 2018.</p> <p>1.9 The above policy context is an important factor in shaping the new local plan and should be fully explained. The Introduction section of the Issues and Options document simply suggests (at page 3) that existing plans within the West of England authority area are required to be reviewed and updated alongside the West of England Joint Spatial Plan (JSP) JSP . However, there is no acknowledgement that the review is overdue.</p> <p>1.10 Paragraph 24 of the NPPF 2018 states that local planning authorities are under a duty to cooperate with each other. The Issues and Options document makes no reference to this duty and this should be addressed as soon as possible unless the Council considers that it does not relate to the local plan review process. If this is the case this should be explained for the benefit of any doubt.</p> <p>1.11 In general it is not clear what the evidence base is that has informed the issues and options outlined in the Consultation Document. For example, whilst the Consultation Document suggests it is directly informed by the JSP, North Somerset Council has not identified the relevant evidence, which supports the proposed need for 25,000 homes to 2036. Whilst it is understood that this may have been prepared for the JSP, for clarity it should be made clear which documents from the JSP evidence base are being relied upon. It should not be assumed that those commenting on the new local plan documents have access to the evidence base for the JSP and more importantly should make it clear which documents are relied upon.</p> <p>1.12 It is widely acknowledged across the political spectrum that the UK is in the grip of a housing crisis. Nationally, the average house now costs eight times the average income. Whilst the causes of the housing crisis are complex, at the most basic level, as a nation we have not been building enough homes.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>1.13 In June 2018 an appeal decision relating to at Weston Business Park, Laneys Drove, Locking, North Somerset BS24 8RA (Appeal Ref: APP/D0121/W/17/3184845) confirmed that the total five year supply of deliverable housing was 8,565 dwellings, or 4.4 years. It would appear that the Council's existing housing policies are not working. In light of this it is disappointing that the Consultation Document has not highlighted the need to build more homes as the key issue facing the whole of North Somerset that the Local Plan must address.</p> <p>1.14 Overall it has been difficult to provide feedback as the Issues Options is being prepared in advance of the adoption of the JSP. Page 4 suggests that the starting point for the North Somerset local plan 2036 is the proposed district apportionment from the JSP although this has yet to be tested at examination. The JSP has been in preparation since 2015. The examination has now been delayed until at least May 2019 and there is no certainty as to when the plan will be adopted. If the North Somerset Local Plan 2036 (NSLP 2036) is to be informed by the JSP it should acknowledge that the document will need to change to reflect any consequential changes to the JSP and specifically the overall housing and employment requirement for North Somerset.</p> <p>2. North Somerset wide issues</p> <p>2.1. The figure at page 8 identifies the constrained nature of North Somerset. This highlights that development will need to be accommodated in less constrained areas wherever possible. However, the Council through its Sustainability Appraisal work will also need to consider whether locating development in the Green Belt will create a more sustainable form of development.</p> <p>2.2. The key issues have not identified all the challenges or issues facing North Somerset. Housing affordability is a significant issue for the area and should be a major factor in shaping policies of the new local plan. According to the Council's Housing Strategy 2016-21</p> <ul style="list-style-type: none"> • The average price of a property in August 2015 was £197,528 or almost seven times average full time earnings • Over a quarter of private rented homes do not meet the decency threshold, with a high concentration of these homes in the Weston-super-Mare central area • The district has the seventh largest inequalities gap - the gap between our wealthiest and poorest communities – in the country. One stark example of this is life expectancy, which is nine years lower for men and six and a half years lower for women in the most deprived areas compared to the least deprived area in the district. <p>2.3. The Strategy (page 17) acknowledges that the South West of England has the third highest house prices after London and the South East, and the WoE region has the third highest house prices in the South West after Dorset and Gloucestershire. It goes on to state that:</p> <ul style="list-style-type: none"> • households on low to middle incomes are as a result finding it harder to afford owner occupation. • Lower quartile house prices in the district are 7.68 times greater than lower quartile incomes, making affordability a real issue. • The deposit required by lenders to access a mortgage is now much greater making it more difficult for first time buyers to enter the housing market and fuelling the growth in Buy to Let. • Households unable to access home ownership may remain living at home or live in the PRS, the so called 'generation rent'. <p>2.4. The adopted Core Strategy 2017 already includes policies which prioritise the re-use of previously developed land although it is not clear whether these policies have not been effective. In isolation increasing densities is not considered to represent a realistic option for growth. There is no evidence to suggest that doing so would deliver the level of growth required over the plan period to meet needs. Other options will need to be considered alongside policies which seek to increase the density of development.</p>	
Wrighton Village Alliance		Nailsea and Backwell - air quality improvements on A370 is also an issue that should be addressed	issues and options response v1 word.docx (11 KB)

Document Part Name		Q1. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?	
Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	<p>Q1. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?</p> <p>The content of the key issue list is generally agreed.</p> <p>Strategic Flood Risk Assessment (SFRA) Update is Essential - The starting point for any forward plan work must be the updating of the NSC Strategic Flood Risk Assessment. It is understood from NSC that a project to update some parts of the outdated Strategic Flood Risk Assessment for North Somerset will commence shortly. However, the existing reports date from 2008/09 and updated Environment Agency guidance on climate change was published in February 2016. It is essential that any forward plan making starts with a fully up to date SFRA as this is an entirely avoidable constraint that must be at the centre of planning future sustainable development locations. Since the JSP is also under examination and therefore as yet remains untested, any SFRA update needs to be comprehensive for the North Somerset District and not limited in scope to the Strategic Development Locations (SDLs) which are yet to be tested and agreed.</p> <p>The map (see attachment) illustrates both fluvial and tidal flood zone 3 surrounding Weston-Super-Mare and is based on NSC's mapping (see here). Development within Flood Zone 3 is not sustainable. Any forward plan making must have full regard to flood risk and for that it is essential that the outdated SFRA's are replaced before any land is allocated to consider all potential flooding risks based on robust data.</p> <p>Employment - Urban intensification will be necessary but additional residential accommodation must remain supported and led by local employment. It is agreed that employment policies should be reviewed and updated. New policies for Live-Work units should also be developed and used as a tool across NSC's district. With the fast evolution of fibre to the premises, Live-Work units provide the most effective opportunity to reduce transport pressures by reducing commuting pressures.</p> <p>Live-Work – Live-Work units were formally recognised in Planning Policy Statement 4 (PPS, Dec 2007). The PPS was drawn up as part of the government's response to the Barker review of land use planning, published in 2007, which also supported the benefits of Live-Work units as an eco-friendly mechanism for housing and economic development. This mix of uses takes account of the changes in spatial work patterns allowed by advances in information and communications technology. With broadband roll-out, fibre to the premises (FTTP) will be accessible to all within the plan period and that promotes home working for many work functions. Many traditional small craft and art businesses are also now popular. A policy embracing and supporting Live-Work units is capable of delivering small residential units coupled with employment use, beneficially avoiding commuting effects. It is therefore recommended that Live-Work units be actively considered during this forward plan process and that a specific relevant policy is incorporated within it.</p>	
Avon Wildlife Trust	Avon Wildlife Trust	No comment.	
Avon Wildlife Trust	Avon Wildlife Trust	No comment	
Blagdon PC	Blagdon Parish Council	<p>Blagdon Parish Council (BPC) considers that the major issues are all included.</p> <p>In respect of how the issues are to be addressed, the key priorities are: exploitation of brownfield sites; developing transport connectivity (both public and private) between local residential centres such as the countryside villages and major employment and education hubs; and given the current difficulties faced by High Street retail, reassessment of underused buildings.</p>	
Chris Butler		Planning permission should depend on ACTUAL availability of essential support service provision and infrastructure like healthcare, currently GP surgeries stretched, WSM A&E closed overnight, schools full, yet massive increase in population and traffic through new housing! This is crazy. NSC receive extra council tax and New Homes Bonus but NHS/Police nothing????	

Respondent Name	Respondent Organisation	Comment	Attached documents
Congresbury Parish Council	Congresbury Parish Council	We agree with the challenges and issues facing Weston-super -Mare that have been listed. However, it seems there is a lack of planning of infrastructure and transport. Weston-super-Mare road network is currently choked at peak times and this can only get worse with future development. An increase in population will put extra strain on the health care and hospital provision. The plan should look to ensure sites for potentially a new or upgraded hospital fit to serve a larger population in 2036 and beyond. No mention has been made of the threat of climate change on possible problems with coastal and fluvial flooding of the area.	
CPRE Avonside	CPRE Avonside, North Somerset District	<p>CPRE North Somerset responded to the Weston-super-Mare SPD in December 2016. Our comments at that time are still relevant and are attached.</p> <p>Despite the considerable effort to improve the seafront, more focus is needed on the heart of the town. All of the key issues are reliant on the regeneration of the town centre. More needs to be done with retailers and developers to maximise capacity of the High Street and adjacent shops. Residential accommodation above shops would help to make the area a more vibrant and safe community.</p>	Response to the NSC Weston-super-Mare draft SPD December 2016 (2).pdf (303 KB)
D.Hayler		<p>It is unclear how WSM's position in the region is considered in this consultation. It is evident from the traffic entering and leaving WSM during weekdays, as well as train and bus links, that a considerable element of the population are employed outside of WSM. While encouraging employment within WSM makes absolute sense, many employers situated with the Bristol 'catchment' will effectively never relocate to WSM. As such, WSM and other settlements within NS will always have a considerable role to play as dormitories for non-North Somerset based employment.</p> <p>This must be factored in to NSC's planning across the whole local plan (not just for this WSM section). Comments and promises relating to infrastructure improvement are far easier to make than the evidence-base proves they are to deliver. Infrastructure typically lags many years behind residential development, even more so where national considerations and government decisions are involved (irrespective of politically convenient promises).</p> <p>A focus on existing infrastructure, known improvements already in development and proximity to the actual employment and recreational markets the housing is supplying is critical. Framed in this way, required future development can be sustainable, meet the required needs and be delivered with a positive impact on NS. Without this focus, NS will inevitably be tempted to ensure 'everyone gets a little bit' to thinly spread opposition, resulting in development which lacks the necessary infrastructure (possibly forever) and is therefore unsustainable.</p>	
Ecomotive Ltd		<p>We agree with these challenges in general. We also note that in Weston-super-Mare there is a relatively high proportion of households in rented accommodation and that quality of private rented homes is an issue.</p> <p>Community-led housing could help to tackle many of the issues identified for Weston-super-Mare. Because developments that are rooted in, and led by, members of local communities are able to draw upon the experience and understanding of local people about the issues they face, they are uniquely placed to be able to respond to these needs. In addition, people that participate directly in the process of design, construction and/or management of homes through a community-led organisation gain increased skills, self-confidence and sense of belonging, among other things. This is very different from local residents being 'consulted' on developer-led schemes in their area.</p> <p>In particular, community-led schemes could provide an excellent route to addressing the issues set out in the Issues and Options paper, including the following : (see table in the attached document)</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
GVA Grimley	GVA Grimley	Given delivery implications for Locking Parklands we support the reference to re-assessing the existing employment led approach to ensure it remains fit-for purpose. We make further comments within the employment section below.	
H Shea		NSC need to consider those of us who cannot get around due to illness/disability without a car. I agree with sustainable transport but it needs to be balanced with options for those that have to use a car to get around, especially within Weston/Worle.	
Hayes Family and Mr Cope		<p>5.2 We consider that the challenges and issues identified are appropriate but suggest that NSC should incorporate an additional target regarding the delivery of high-quality market and affordable housing in order to address worsening affordability in the district and provide a diverse range of housing types. This is key to ensuring future housing land supply targets are met, reduce levels of out-commuting and providing homes for local people.</p> <p>5.3 The Local Plan could address this by allocating a minimum of 2,000 dwellings on sites (by combining non-strategic growth and 'urban living', which we go on to discuss under question 27) of less than 500 dwellings in size, on a mix of brownfield and greenfield sites for development. Provision of additional housing supply will slow the rate of inflation and ensure choice and competition in the market, a key requirement of the NPPF. A key challenge for any local authority should be the provision and delivery of housing.</p>	
Homes England	Homes England	In response to you're the public consultation Homes England wishes to comment briefly on the Consultation's potential impact on the Agency's land holdings in Weston-Super-Mare. We support the Council's desire for urban regeneration and town centre vibrancy in Weston-super-Mare.	
J Gower-Crane		Bleadon is an ancient settlement with a rural tradition of farming, still practiced today. We/NSC needs to protect our local fields and green spaces and create a strategic gap for Bleadon to protect its character and stop it being consumed by urban sprawl from WSM.	
JC	Weston Hillside and Central Forum	I am a long-time resident of Weston-super-Mare (45 years) and are finding the scale and size of development aimed at North Somerset (particularly WsM) over ambitious and out of proportion for such a relatively small county.	
jerb44		The needs of Weston super mare should be limited to those necessary for the natural increase in population. It is wholly inappropriate for this environmentally sensitive area to plan to accommodate others who will inevitably travel by car to Bristol.	
Kit Stokes	StokesMorgan Planning Ltd	<p>North Somerset Council needs to adopt a pragmatic approach to development in the town centre and the sea front. Large scale greenfield development to the east and towards the M5 has meant that property values have stagnated in the central areas.</p> <p>There are many brownfield sites in need of renewal but development is not viable and key sites remain as HMO's, budget facilities and rehab centres.</p> <p>If there was a pragmatic approach to:</p> <ul style="list-style-type: none"> • CIL • affordable housing 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • car parking standards • building in the flood plain and • loss of tourist facilities <p>Development of the town centre would become more viable and attractive to investors compared with the greenfield development by volume house builders.</p>	
Lands Improvement		<p>3.1 We are broadly supportive of the proposed approach to development at Weston-super-Mare. We consider that there are ample opportunities for urban intensification and regeneration within the settlement which will ensure the settlement can meet its needs. Given that is the case then there should be no need for greenfield allocations at Weston-super-Mare.</p>	
Libbyrich		<p><u>I agree that W-S-M</u> should be the main growth area in the district but I do not feel that the proposed strategic locations adequately fulfill the needs and desires to live and work near Bristol and the growth area of Severnside</p>	
Mead Realisations Ltd		<p>The figure at page 8 identifies the constrained nature of North Somerset. This highlights that development will need to be accommodated in less constrained areas wherever possible. However, the Council through its Sustainability Appraisal work will also need to consider whether locating development in the Green Belt will create a more sustainable form of development.</p> <p>The key issues have not identified all the challenges or issues facing North Somerset. Housing affordability is a significant issue for the area and should be a major factor in shaping policies of the new local plan. According to the Council's Housing Strategy 2016-21</p> <ul style="list-style-type: none"> • ? Over a quarter of private rented homes do not meet the decency threshold, with a high concentration of these homes in the Weston-super-Mare central area • ? The average price of a property in August 2015 was £197,528 or almost seven times average full time earnings • ? The district has the seventh largest inequalities gap - the gap between our wealthiest and poorest communities – in the country. One stark example of this is life expectancy, which is nine years lower for men and six and a half years lower for women in the most deprived areas compared to the least deprived area in the district. <p>2.3. The Strategy (page 17) acknowledges that the South West of England has the third highest house prices after London and the South East, and the WoE region has the third highest house prices in the South West after Dorset and Gloucestershire. It goes on to state that:</p> <ul style="list-style-type: none"> • The deposit required by lenders to access a mortgage is now much greater making it more difficult for first time buyers to enter the housing market and fuelling the growth in Buy to Let. • households on low to middle incomes are as a result finding it harder to afford owner occupation. • Lower quartile house prices in the district are 7.68 times greater than lower quartile incomes, making affordability a real issue. • Households unable to access home ownership may remain living at home or live in the PRS, the so called 'generation rent'. <p>2.4. The key issues affecting Weston Super Mare are also not fully expressed. The third key issue listed at page 9 refers to the employment-led approach to growth at Weston. However, it is not clear whether this approach has been successful in</p> <p>reducing self-containment reducing out-commuting. As set out later in these representations it is considered that the new local plan should consider other opportunities for attracting investment to Weston.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>2.5. The adopted Core Strategy 2017 already includes policies which prioritise the re-use of previously developed land although it is not clear whether these policies have not been effective. In isolation increasing densities is not considered to represent a realistic option for growth. There is no evidence to suggest that doing so would deliver the level of growth required over the plan period to meet needs. Other options will need to be considered alongside policies which seek to increase the density of development.</p> <p>2.6. The fifth stated key issue at page 9 refers to the need to address congestion issues particularly related to the M5. As set out later in these representations relating to Section 8 of the Issues and Options congestion at Junction 21 is considered to be a significant issue affecting Weston Super Mare and should be addressed as a matter of urgency.</p>	
Moor Park (North Somerset) Ltd (MP)		<p>A key issue for Weston-super-Mare is the imperative to review the Strategic Gaps (SGs) that tightly constrain the growth of the town, and which therefore potentially conflict with it fulfilling its role in the settlement hierarchy/strategy, and therefore the effectiveness of the latter. Given that Weston-super-Mare is the largest and most sustainable settlement in the district, the constraints that the SGs impose on the town's ability to perform its strategic role are potentially fatal to the sustainable development strategy of the plan unless that conflict is resolved. As will be elucidated in the representations below, it was alluded to by Inspector Burden in her report on the Examination of the Site Allocations Plan, but is a key issue on which the current consultation document is silent.</p> <p>The need to review, and in all probability, discontinue the SG policy, is therefore a very live issue that has been foreshadowed in the recent deliberations of an Examination Inspector, and is therefore one that is potentially fatal to the new Local Plan if it is not addressed. In the representations that follow, the imperative for review of the SG policy is substantiated.</p>	
N Cooper	Claverham Future	<p>There is a glaring omission from any of the thought processes, there is no acknowledgement of where people work, especially those who seek to move into our county. Who can afford the housing in North Somerset and where do they work to earn that level of income? North Somerset is already established as a dormitory for major employment hubs (frankly that is not W-S-M). If there was any chance of significant affordable or social housing to be provided then this may change. The fact is that any plan to get the private sector to provide such 'truly affordable' housing (not just a random percentage slightly less expensive) is sorely misjudged. Unless North Somerset builds housing of 100% truly affordable or to rent this will not change. The fact is that Weston Super Mare is only important in being the largest conurbation in North Somerset, it has no significant draw for people or employers seeking or providing the high paid work necessary to buy into the current market. Other people who can afford the housing are retired people, who add to the strain on diminished and stretched resources.</p>	
Nailsea		<p>The constraints map shown is not up to date as the flood plane shown does not accord with the latest Environment Agency plan 2018</p>	
Nailsea Unit Trust (c/o Ellandi LLP)	Williams Gallagher	<p>The emerging West of England Joint Spatial Plan does not include an up to date assessment of retail and leisure needs. This omission should be addressed at a local level with up to date assessment work if the JSP does not factor in overarching requirements / strategy (which at present it looks unlikely to do as the plan is soon to be considered at Examination).</p> <p>We have made representations to the JSP which identify that retail and leisure requirements are to be regarded as key infrastructure that is required to support the housing and employment growth envisaged in the emerging Plan. Accordingly, it is our view that they should be planned for at a strategic level to ensure that the region's retail and leisure needs are met and that these needs are directed to the most sustainable and accessible locations.</p> <p>The identification of a network of centres (where retail and leisure is to be focused) within the North Somerset Local Plan is welcomed in order to promote sustainable travel patterns, which result in a reduced need to travel, especially by private car, to access retail and leisure facilities of an appropriate type and nature.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The updated policies of the North Somerset Local Plan should maintain a presumption against new out-of-centre or edge-of-centre retailing facilities. Any new facilities in such locations, including the identification of new local or district centres, should be tested in line with the retail tests established in NPPF which are also to be applied through the plan making process. This underlines the importance of having up to date retail and leisure needs information to inform the emerging local plan.</p> <p>In light of the above, clarity is required in respect of how retail and leisure needs are to be assessed in the emerging plan to support the strategy that will be set as a requirement of bullet point 2 on Page 10 of the Issues and Options Document.</p>	
Natural England	Natural England	<p>Weston-super-Mare is adjacent to the Seven Estuary SPA, SAC, Ramsar, and SSSI and close to Mendip Limestone Grassland SAC at Uphill, Brean Down and Bleadon SSSIs. The JSP HRA identifies likely significant effects from increased recreation on these European sites. There will be a need for suitable mitigation measures and strategic solutions to be agreed as part of the WoE GI Plan. These will need to be reflected and supported in the Local Plan policies for Weston-Super-Mare where relevant.</p>	
Nico2005		<p>I do not agree with the Local Plan 2036, this argument has been ongoing for months, in short the Council will be ripping the heart out of the countryside, in particular at the foot of the Mendip hills, there are more than enough developments in progress, already the local roads and amenities are not coping, how can intelligent people accept this is going to work. The addition of a relief road is only going to push the problems further towards the airport causing further congestion, it is obvious the airport will get to saturation point, one has only have to experience the rush hours, it is unacceptable.</p> <p>There is an alternative being the land close to the new ring road, services and infrastructure are already in place, can the council not see this, it is the obvious route to take with plenty of room for 4000+ dwellings.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>As the largest town in North Somerset offering a wide range of services and facilities, it is of some concern that no new allocations are proposed, whilst development close to the town at Banwell and also Churchill will add to road journeys into and out of the town. The timing of development in relation to the provision of the proposed new motorway junction and the Banwell (and Churchill) bypasses is therefore critical if traffic conditions in Weston-super-Mare and congestion issues at J21 are not to become worse.</p> <p>We comment further on the employment-led strategy in section 6, and support the intention to review that policy.</p> <p>We recognise that further growth can be realised by achieving higher densities. This should include the option to revisit existing master plans for the undeveloped areas in Weston Villages, as well as locations in the town centre and urban intensification on the A370 corridor.</p>	
Portishead Town Council	Portishead Town Council	<p>Agree that Weston Super Mare should be the main growth area but that there is a real need in the north of the district to provide opportunities for people wishing to live and work nearer Bristol and the growth area in South Gloucestershire and Severnside.</p>	
Wessex Water (Ruth Hall)	Wessex Water	<p>Urban regeneration and redevelopment offers opportunities to remove surface water flows from foul systems, which will reduce sewer flooding and improve water quality. Wessex Water will want to safeguard any strategic sewer routes if these are affected by future development.</p> <p>We welcome the intention of North Somerset to co-ordinate infrastructure delivery with other agencies. This will encourage holistic foul and surface water networks supporting phased development rather than increased disruption and cost generated by piecemeal schemes. We note the proposed Local Development Order for the Food Enterprise Zone at Weston Airfield Business Quarter and would recommend early consultation with Wessex Water to consider the availability of public foul network</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		connections, network and treatment capacity. Many food processes require a trade effluent consent with detailed discussions on the composition of potential trade effluent discharge to the public system.	
Weston Town Council	Weston-super-Mare Town Council	<p>The Weston-Super-Mare Town Council considers that the Weston area is willing to take its fair share of development on available land, including adjoining and nearby parishes. However density is important. Experience shows that housing of too high a density is harmful. New housing must be of lower density than recently and of good quality and design.</p> <p>The centre of Weston can be brought to life by using empty flats above retail shops for residential and community projects.</p> <p>In order to accept and cope with further development Weston needs further facilities and infrastructure developed before or alongside (and not after) housing development including:</p> <ul style="list-style-type: none"> a) improved medical facilities and a fully open general hospital including a 24 hour accident and emergency. b) improved public transport in general including buses trains and facilities for cycling into the town centre. In particular Weston needs a dual track railway line from Worle junction to improve train services particularly in a northerly direction. c) new primary schools and new or expanded secondary schools. d) Commensurate land for job creation, business parks, factories etc. e) improved road access including, recognising that many people will continue to use road transport, major improvement to Junction 21. <p>Finally the Town Council, while willing for the Weston area to take yet further development, requests that Clevedon, Nailsea, Portishead and large villages should also take their fair share of new housing development.</p>	
Weston Town Council	Weston-super-Mare Town Council	<p>Weston-super-Mare Town Council is willing for Weston and the surrounding parishes to take their fair share of further development. However better transport, educational and health infrastructure is vital. This must be provided before of alongside housing development and not after.</p> <p>In addition the town and area must not be developed at too high a density as in the past when mistakes have been made. Most of the housing particularly outside the town centre must be lower density and high quality is essential.</p> <p>Subdivision of existing properties must also be controlled to ensure better quality and not too high density.</p> <p>Infrastructure that is essential includes:</p> <ul style="list-style-type: none"> a) Improved medical and health facilities and in addition a fully functioning general hospital including a 24 hour accident and emergency. b) Improved public transport facilities especially dualling of the railway track into Weston to increase rail capacity. c) improvements to junction 21 which is already a bottleneck. d) educational facilities including new primary schools and if necessary a secondary school. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>e) Land and facilities for employment creating development.</p> <p>Finally while Weston is willing to take its fair share of development the towns of Portishead Nailsea and Clevedon and large villages must also be required to take their fair share including adjusting the green belt boundary if necessary.</p>	
Wrighton Parish Council	Wrighton Parish Council	<p>What are the Key Issues? Pt.7 – Why only the A370 corridor and does this mean A370 Bristol/WsM or just part of the corridor?</p> <p>Pt.5 – Local/public transport is only good along the A370; in villages it is not fit for purpose (eg Wrighton and Redhill)</p>	

Document Part Name

Q2. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex		see below	
Alex Child	The Planning Bureau Ltd	<p>There is a need for specialist housing for older people in North Somerset. The supply of specialised accommodation for home ownership is extremely limited in comparison with demand in North Somerset and particularly so in Clevedon . A recent report carried out by Three dragons in the town found that despite a high level of owner occupation among older households and a preference to continue in home ownership, there is an under-supply of sheltered accommodation for home ownership and a severe undersupply of Extra Care accommodation for home ownership as there are no private sector schemes aimed at owner occupiers. Clevedon has 14 schemes: 9 for social rent, 1 for market rent and 4 leasehold sale. The provision of specialist housing in a community creates the opportunity for shorter-distance moves, enhancing the mix of age groups and community sustainability. Older people can retain their social and service networks, reducing the degree of adjustment required and hence the stress of moving. Proximity to family members enables mutual support including child care, shopping, transport to activities and appointments. Overall such schemes bring about an improvement to health and well being in the older people who reside there with consequent savings to the public purse.</p> <p>Policy formulation for Clevedon should therefore include provisions that specifically encourage the provision of retirement housing for older people.</p>	
Aston	Aston and Co UK	<p>It's agreed that a key priority needs to be better connectivity/integration between Hill Road, The Triangle (Town Centre), the seafront and Salthouse playing fields. There remain great opportunities.</p> <p>As above local employment remains essential and a policy promoting and encouraging Live-Work units is supported.</p> <p>The proposed contingency housing site to the east of M5 Junction 20 is not supported for the following reasons:</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ol style="list-style-type: none"> 1. As the maps illustrate this land is low lying, surrounded by main rivers forming part of the Tickenham Moors reclaimed land. It is in Flood Zone 3 and is consequently not located within a sustainable 2. The M5 creates an undesirable barrier/separation of the proposed housing site from the main town. 3. The network of rhynes adjacent to Nailsea Moor are designated as a Site of Special Scientific Interest (SSSI) and a Site of Nature Conservation Interest (SNCI) and there is water pathway inter-connection. 4. Newhouse Farmhouse and Newhouse Cottage are located within the designated area and are Grade 2 Listed. 5. The M5 creates an existing physical settlement boundary to Clevedon to the east, restraining further migration of development into open countryside. 6. Residential land use directly adjacent to a motorway is not ideal in terms of noise and air quality, particularly given the UKs current air quality issues. 	
Avon Wildlife Trust	Avon Wildlife Trust	No comment	
Blagdon PC	Blagdon Parish Council	<p>Blagdon Parish Council (BPC) considers that the major issues are all included.</p> <p>Transport links, particularly to the M5 must be a priority.</p> <p>Whilst not suggesting that policy should advocate major commuting out of Clevedon, the difficulties created in and around the town when problems occur on the motorway network are well-known and should be mitigated. Hopefully, the JTS will offer some feasible, affordable solutions.</p> <p>Any Green Belt amendments must be small-scale although there is no definition of what this implies.</p>	
Clevedon Town Council	Clevedon Town Council	<p>The town needs to have an increase in employment in order to generate the rates necessary to support infrastructure development. Therefore, to encourage the maintaining of commercial sites, make use of existing buildings and look to improve business viability.</p> <p>Clevedon's infrastructure needs improvement. The traffic congestion in Clevedon during morning and evening rush hours causes a gridlock situation detrimental to the economic viability in Clevedon.</p>	
Congresbury Parish Council	Congresbury Parish Council	We would strongly agree with your identified challenges and issues, especially looking at a review of 'car accessibility and public transport'. Clevedon should have better access links with Weston-super-Mare as well as better public transport. Employment sites should be identified to ensure Clevedon flourishes. No mention has been made of the threat of climate change on issues with coastal and fluvial flooding of the area.	
CPRE Avonside	CPRE Avonside, North Somerset District	<p>Clevedon has motorway connections which although not 'sustainable' provide routes north/south.</p> <p>Frequent congestion on the M5 and to Bristol emphasises the importance of having sustainable modes of transport in place before development.</p> <p>New west/east roads would be highly destructive to important heritage and landscape.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		We would expect the new 'Visions' being prepared would respect the landscape and work to enhance the setting of the towns.	
Ecomotive Ltd		<p>The issue of an ageing population is also relevant in Clevedon, which will result in an increasing need to provide suitable accommodation for older people, within the period of the new Local Plan.</p> <p>We note that a proposed action in the paper is to identify more sites for housing within the town. Given the issue of the ageing population in Clevedon, we would suggest that this town would be a good location to explore new models of supported living for older people, for example in senior cohousing or multigenerational communities. Therefore new sites for housing could be prioritised for these kinds of projects, for example by designating specific sites for CLH and/or self build housing. (see table in attached document)</p>	
GVA Grimley	GVA Grimley	<p>This list of key issues fails to recognise the significant under provision of new family and affordable housing within the town given the distinct lack of strategic residential allocations in the existing or emerging Plan. The key issues should fully reflect the requirement to encourage and enable young people and families to remain in the town (as well as attracting new young people and families). We note the reference to new housing sites being identified in the town but these need to be deliverable in the short to medium term rather than a contingency site.</p> <p>The issues should also recognise the challenges to bringing forward existing employment sites such as St Modwen's land West of Kenn Road and explore options such as mixed use opportunities to facilitate their delivery.</p>	
Hallam Land Management Ltd (David Lock Assoc)		<p>David Lock Associates has prepared this statement on behalf of Hallam Land Management Ltd (HLM), who are promoting strategic-scale, mixed-use development on the Land East of Clevedon (Junction 20); for which they have a long-term agreement in place with landowners. HLM are the land promotion arm of Henry Boot PLC who have a proven track record in bringing forward new strategic development opportunities, taking responsibility for ensuring the delivery of sites including the provision of related infrastructure, including affordable housing.</p> <p>We have made representations to the West of England Joint Spatial Plan, related specifically to the 12 broad areas for development referred to as SDLs, but also generally in relation to the housing requirement which HLM consider falls short of meeting housing need. The Land East of Clevedon is currently identified as a contingency site within (WoE JSP) submission document. The relevant policy is Draft Policy 2 which identifies an additional contingency supply of around 3,000 dwellings, across the West of England Authorities, should development not come forward as anticipated. Land East of Clevedon is identified as the contingency site for North Somerset, and therefore is of significance to the Issues and Options consultation to this Local NSC Local Plan review.</p> <p>To summarise, HLM have submitted representations to WoE JSP that questions the effectiveness of the adoption of a contingency category which is only 3% of the total supply figure and proposes that the Authorities should proceed with the contingency figures as part of the total supply, so that these numbers are capable of contributing in the round to the overall housing demand.</p> <p>HLM have prepared and submitted an evidence base that provides confidence underpinning the identification of the Land East of Clevedon as an SDL for North Somerset in its own right in the JSP – with a capacity to deliver some 2,500 homes, employment land and local retail facilities and services. Importantly, the site performs a key role in the</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>wider development strategy that is required to unlock the SDLs at Nailsea-Backwell in the short-term which could alleviate reliance on costly transport schemes for which external funding might have to be secured through the provision of a new link road to Junction 20.</p> <p>The principle and scope of the contingency sites will be a key focus for the upcoming WoE JSP examination, which could result in significant amendments to strategic outcomes for the Plan, and therefore a good degree of flexibility is needed at this Issues and Options stage to ensure that the NSC Plan review can progress alongside and in accordance with an as yet untested wider WoE strategy.</p> <p>In the event that the contingency category is retained in the JSP, its evidence base makes clear that the contingency sites will come forward through Local Plan review, and therefore it is critical that the North Somerset Council Local Plan 2036 provides an appropriate policy framework to support the delivery of this site, whether it is to reflect its amended “outright” SDL status in the JSP as HLM propose, or if retained as a contingency site. HLM consider that the Issues and Options document as currently drafted does not secure this effectively. The site should be assessed now, at the same time as the other SDLs, rather than upon early review of the plan.</p> <p>In addition, and notwithstanding the compelling residential-led mixed use credentials of the site, HLM consider that this site also has the potential to meet employment needs of North Somerset in the short-term.</p> <p>HLM broadly agree with the scope of issues and challenges outlined in the consultation document, and have the following comments relating to specific key issues.</p> <p>HLM note that there is no reference to meeting local housing needs to include affordable housing at Clevedon. It is widely recognised that North Somerset has housing affordability issues, with house prices exceeding affordability. It is therefore considered necessary to ensure due consideration is given to meeting affordable housing needs as part of a balanced delivery of homes within the Clevedon area.</p> <p>Issue 1 - How to help promote and increase the attractiveness of the town centre to both users and investors such as retailers/other businesses.</p> <p>Providing a sufficient mix of constant housing supply is a key factor in supporting existing services and create new demand for service sector businesses as well as a wider range of employment sectors. Indeed NPPF Paragraph 8 recognises that such economic and social objectives are intrinsically interlinked in the pursuit of sustainable development and joined-up planning. Clevedon has experienced limited residential development over the past plan period, and as a result its town centre has not experienced the increase in footfall that other towns across the district have, which has likely limited the opportunities for the growth of town centre.</p> <p>The current settlement hierarchy places Clevedon at the second tier; below Weston-super-Mare but equal to Portishead and Nailsea. However, recent development across the district has not come forward in accordance with this hierarchy – Weston, Portishead and Nailsea - have all benefitted from more development in recent years. NSC should now be seeking to address this unbalance and take this opportunity to secure housing allocations in Clevedon, which is considered to be a more effective strategy than the approach which relies on the emerging ‘Urban Living’ initiative which, whilst may achieve indirect benefits, is not prescriptive or strategic enough to direct sufficient development to a Tier 2 settlement.</p> <p>There is also a significant opportunity for Clevedon to increase town-centre and sea-front footfall perhaps as part of a wider tourism strategy which would have strong support through proposed enhanced infrastructure connections to encourage local tourism from Nailsea, Backwell (strategic growth locations), and Bristol (the enhanced infrastructure in this case being the link between Nailsea and Backwell, which the land to the East of Clevedon will help to facilitate).</p> <p>Issue 4 - How to encourage the retention of business/employment uses within the town and to the south at Clevedon 5/20 and west of Kenn Road to ensure there are opportunities to work locally, rather than commuting.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Land West of Kenn Road has been allocated for a considerable time within the current Core Strategy, but with no viable employment schemes coming forward. This may be in-part due to its poor accessibility (relative to other areas of the town and around Junction 20), particularly with regard to the strategic highway network, but also to the town centre and local bus routes. The absence of a good mix of available and accessible employment land has wide-ranging disadvantageous implications from economic, sustainable, and local employment perspectives. Additional land should be allocated – particularly sites well located to the primary road network.</p> <p>With a shift in retail habits, and consumers now purchasing more of their goods online, there is a growing requirement for larger distribution units (such as those which have been constructed at Avonmouth) in locations with excellent connectivity.</p> <p>The Land East of Clevedon presents an opportunity to allocate new, high-quality employment land adjacent to Junction 20 that could support a range of employment uses that offer flexibility in terms of potential uses and scales, and high accessibility; not only locally within and around Clevedon but also within the wider district supported by proximate access to the strategic highway network. New employment land opportunities would also be supported by a committed infrastructure investment in the Nailsea to Clevedon corridor as well as improvements to the M5, and its delivery could be further supported by HLM, an experienced developer with a proven track record in strategic delivery.</p> <p>Issue 5 – Is there a need to review accessibility by car and public transport to the motorway network and Bristol? HLM believe there is evidenced need to review strategic connectivity from Clevedon eastwards towards the SDLs at Nailsea and Backwell, and onwards to Bristol. Not only is the provision of enhanced (in the form of frequency and efficiency) transport important to support the objectives identified in issues 1 and 4 above, but in fact it would be practical and effective for NSC (and WoE) to align infrastructure enhancements with strategic housing and employment allocations along a Clevedon – Nailsea/Backwell – Bristol growth corridor to achieve greater economies of scale and wider sustainability benefits. The WoE JSP evidence base, namely Transport Topic Paper 8, presents a number of infrastructure project packages relating to Nailsea and Backwell. HLM supports in particular those measures identified in Package 3, which includes a new highway link between B3130 (Tickenham Road) and M5 Junction 20. This link is reflected in the masterplanning for the Land East of Clevedon (see concept diagram HLM045/021). Furthermore, the Emerging Findings Transport Report shows the long-term potential of a Nailsea to Clevedon link road, which has also been future-proofed in the masterplanning again shown on the concept plan providing in support of these representations. It is clear that allocation of the Land East of Clevedon would help to secure confidence in the delivery of the chosen transport scheme to facilitate better connections between Bristol and Clevedon.</p> <p>Issue 6- If the proposed contingency housing site identified in the JSP to the east of the M5 J20 is ever brought forward in a future review of the plan, how could this be successfully integrated into the town</p> <p>A ‘Proposed Concept Diagram’ (ref HLM045/021) is enclosed which reflects those drawn for the SDLs within the consultation document. The concept seeks to demonstrate how land east of Junction 20 can deliver a sustainable community that is physically and functionally part of Clevedon, and accommodates aspirations to improve strategic connectivity between Clevedon, Nailsea and Bristol. The concept and Vision is for a mixed-use settlement which is inherently sustainable with strong connections to Clevedon and the wider area, with particular focus on establishing good pedestrian, cycle and public transport links to Clevedon and supporting sustainable transport choices. Court, Manmoor, and Davis Lanes are to be retained and enhanced, whilst a new junction to Tickenham Road and new spur off M5 Junction 20 are proposed which will greatly enhance multi-modal connectivity of the site to Clevedon and indeed eastwards to Nailsea and beyond. Public Right of Way LA22/15/70 and the Avon Cycleway (National Cycle Route 510) run through the site and can be capitalised on to provide active travel to Clevedon. A number of facilities within Clevedon are within reasonable walking distance, including schools, employment areas, supermarkets and health facilities, though strategic development of the proposed scale will support new local facilities.</p> <p>In addition, depending on scale / mix, the site has the capacity to enhance Clevedon’s existing facilities by the provision of additional ‘Town Benefits’ such as community, sports, and education provision. Whilst physically the site is beyond the M5, connectivity enhancements and potential shared facilities will enable a sustainable, long term, future direction of growth to Clevedon.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Hayes Family and Mr Cope		<p>5.4 The contingency site at east Clevedon, identified in both the JSP and the Issues and Options document, lies in defended Flood Zone 3. The provision of housing proposals, which are considered to be a more vulnerable land use in respect to flood risk, is in conflict with national planning policy which seeks to guide such development away from at risk areas.</p> <p>5.5 We accept that there is a scarcity of options within the main urban area of Weston-super- Mare and that development has had to occur in Flood Zones 2 and 3 on both brownfield and greenfield sites in order to promote regeneration and enhance sustainability in this location. However, a new development location outside of the main urban area of Weston-super-Mare, when there are other options available outside of the Flood Zone, is unacceptable without sequential testing being undertaken. In our view this contingency site should be removed from the JSP and should not be safeguarded as a location for development within the NLP, unless it can be demonstrated that there are no other alternative sites available (essentially the application of the sequential test needs to be applied).</p> <p>5.7 We do not consider such a test could be passed because dwellings could instead be allocated to land outside of the Flood Zone in more sustainable locations, such as at land at Locking.</p>	
Hoddell Associates (Quinton)	Hoddell Associates	We have over a long period put forward for housing development clients' lands to the south of Clevedon. On page 11 Clevedon is described and the area to the south appears to be excluded on the basis of flood plain issues yet on page 89 it stated that flood defences could result in Clevedon (amongst other towns) contributing significantly to further development needs. In our opinion this would represent a better outcome than the proposed contingency housing site identified in the JSP to the east of M5 J20. We therefore continue to promote the area to the south of the town as having potential for further residential development.	
Lands Improvement		<p>3.2 With regards to Clevedon, we support a small level of growth, albeit this would need to be considered alongside the likelihood of the JSP contingency site to the east of the town coming forward.</p> <p>3.3 This is a factor that might limit the quantum of development allocated at Clevedon. Indeed, we consider it highly likely that the Council will need to utilise this contingency site due to the likely deliverability issues associated with the other SDLs identified within the JSP.</p> <p>3.4 However, the sustainability of Clevedon means that it should be the focus for at least some development over the plan period. As such, we support the principle of small scale Green Belt releases around the town, following a detailed Green Belt review.</p>	
Long Ashton Parish Council	Long Ashton Parish Council	"Small scale" in relation to developments in the green belt needs to be defined. As Q1 the overall scale may be excessive.	
Margo		Is any significant social or economic data misrepresented or missing? Yes. There are plans to build 2575 dwellings during 2027 with another 725 after 2036. This would go along a new route built from Nailsea to Washing Pound Lane which is just east of Tickenham. Then the route would continue through the village to Clevedon and then to Junction 20 of the M5.	
Mark Funnell, Planning Adviser, National Trust	National Trust	The National Trust owns and cares for numerous historic sites and properties, and areas of countryside and open space in the West of England. In North Somerset, these include the grade I listed Tyntesfield House and a large part of its registered historic parkland, the grade I listed Clevedon Court near to the M5 motorway, Cadbury Camp scheduled monument on the Tickenham ridge, and Dolebury Warren SSSI and scheduled monument in the Mendip Hills (the latter site being managed by Avon Wildlife Trust).	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>One of the key issues in the Clevedon section is stated as: "If the proposed contingency housing site identified in the JSP to the east of M5 J20 is ever brought forward in a future review of the plan, how could this be successfully integrated into the town?"</p> <p>We have not previously commented on this contingency housing area, which is a large area to the east of the motorway. New development in this location is likely to have considerable impact on the countryside and wider landscape (it could also potentially affect long distance views from Cadbury Camp on the Tickenham Ridge). Overall, it may be challenging to integrate such development with Clevedon to the west of the motorway.</p>	
N Cooper	Claverham Future	<p>Clevedon employment would be important if it can provide the level of salaries to meet the costs of the housing as it comes to market or is built for it. Until North Somerset and others start to build "council housing" again, and keep it on their books, there is unlikely to be significant employment that makes housing affordable. If nothing is done, the private sector will provide for commuters to Bristol and beyond.</p>	
Natural England	Natural England	<p>Natural England is in the process of identifying a route for the England Coast Path through North Somerset, which will provide improved public access to the Severn Estuary. The ECP route as currently envisaged would include a section of new public access to the south of Clevedon. Natural England has identified important high tide roosts for SPA bird species along this stretch of the coastline, which are vulnerable to disturbance. As such, suitable mitigation measures will be needed to protect birds and will form part of the ECP proposals to the Secretary of State. We would expect the ECP HRA recommendations will be an important consideration when considering the effects of new development in Clevedon.</p> <p>The Contingency site to the east of the M5 at J20 is in close proximity to Tickenham, Nailsea & Kenn Moors SSSI and Court Hill SSSI. Norton Wood, which includes areas of ancient woodland, and beyond that Gordano Valley SSSI (and NNR) are located to the north of the site. Development in this location has the potential to significantly impact on sensitive habitats and an important ecological corridor used by birds, bats and other wildlife.</p> <p>Further information will be needed to understand the likely environmental effects of development of this site and to inform future proposals.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>Clevedon is one of three main towns in North Somerset, which has only received limited residential growth in recent years. This lack of development has impacted on the town centre in contrast with the position at neighbouring Portishead where the development of the Marina and Ashlands has provided the impetus for investment and extension of the centre. Lack of sustainable transport options clearly restricts further development in Clevedon and this could only be addressed in the longer term in order to support further development opportunities to the south of the town, in association with addressing potential flood risk issues, as occurred previously with the previous South Clevedon development.</p>	
Tom Leimdorfer		<p>The area to the west of Kenn Road (St. Modwen) could be developed for mixed residential and business/employment use. It is essential to improve facilities for non-car access to Yatton station by 7-day a week half hourly bus service and the extension of the Strawberry Line to Clevedon as a cycling/walking route.</p>	
WENP	West of England Nature Partnership	<p>We welcome the development of a Town Vision to enable residents to help shape the Local Plan.</p>	
Wessex Water (Ruth Hall)	Wessex Water	<p>Urban regeneration and redevelopment offers opportunities to remove surface water flows from foul systems, which will reduce sewer flooding and improve water quality. Wessex Water will want to safeguard any strategic sewer routes if these are affected by future development.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Weston Town Council	Weston-super-Mare Town Council	While Weston is willing to take its fair share of development the towns of Portishead Nailsea and Clevedon and large villages must also be required to take their fair share including adjusting the green belt boundary if necessary.	
Wrington Parish Council	Wrington Parish Council	Both Clevedon and Nailsea are to consider “the opportunity for Green Belt amendments”. However NSC’s policies aver protection for the existing Green Belt (which is highly valued by residents.). NSC has declined to consider sacrificing Green Belt between the southern ring road and Bristol City (Ashton Vale) on the basis of their current policy to protect Green Belt. The two appear to be contradictory.	

Document Part Name Q3. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex Child	The Planning Bureau ltd	The housing needs for older people in the town should be specifically assessed and if necessary, policy formulation for Nailsea should include provisions that specifically encourage the provision of retirement housing for older people	
Aston	Aston and Co UK	<p>Some development at these larger settlements, coupled with investment in necessary infrastructure and community facility upgrades, is sensible rather than the establishment of garden villages. The key issues to address are:</p> <p>Community engagement – more user friendly access to consultation information and means to respond is necessary. It is clear from the 67 pages of responses to the November 2017 Generating Ideas Consultation that people felt excluded from full participation.</p> <p>Green Belt Review – any proposals must start with seeking the optimum solutions and not follow outdated Green Belt constraints. The suggestion that the case for small-scale Green Belt release should be examined is supported and represents an essential requirement for effective plan making. The individual character of each settlement (Wraxall, Backwell and Nailsea) must be respected and protected during Place Making.</p> <p>Transport – the historic constraint on the development of each of these larger settlements has been inadequate transport links. Any expansion in this location must be linked with:</p> <ul style="list-style-type: none"> • Promotion of Live-Work units to reduce commuting pressures as fibre to the premises is rolled out. • The provision of accessible local employment • Rail and highway infrastructure • Improvement in pedestrian and cycle links to Backwell Station and from housing to the service centres. <p>Affordable Housing – this is desperately required across the district. Any land allocated must be able to support the JSP Minimum target of 35% affordable housing. This must be reflected in viability testing and is likely to create significant issues in funding the necessary associated infrastructure improvements.</p> <p>These infrastructure improvements must be implemented ahead of new housing and not afterwards, or not at all.</p> <p>Far more work is required during the development of this plan and ahead of examination to demonstrate that the levels of infrastructure investment required can be supported by a robust viability assessment.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		Land promoters, owners and developers technical evidence produced in support of their promoted land should be drawn into the process and objectively tested as site options are reviewed.	
Avon Wildlife Trust	Avon Wildlife Trust	We note the recognised issues, in particular the impact of the proposed strategic road infrastructure and the environmental implications of development on internationally-protected habitats and floodplain areas. We are concerned about the environmental implications of the abovementioned road infrastructure and would welcome this explicit link, for example: 3. The environmental implications of development and associated infrastructure (including roads) on internationally-protected habitats and floodplain areas.	
backwell		Backwell I do not agree with the proposals for Backwell. Backwell is designated as a “Service Village” and the plan states “Service Villages are locations for small scale development of an appropriate scale either within or abutting the settlement boundary.”	
Backwell Parish Council	Backwell Parish Council	The Issues and Options paper outlines the key issues North Somerset Council (NSC) intends to address in respect of developments at both Nailsea and Backwell, if the strategic growth identified by the JSP at these locations goes ahead. BPC is concerned that matters which affect the suitability of sites for residential development are deferred to the Local Plan stage, and therefore after the broad location has been identified for development through the JSP. NSC proposes that the Local Plan will “ <i>need to test the scale of development proposed</i> ”. The purpose of the Local Plan should be to deliver the allocation of land to meet the strategic requirements of the JSP. The capacity of Strategic Development Locations must be fully tested <u>through the JSP</u> to provide assurances that the capacity exists for the planned scale of development. Similarly, the “ <i>environmental implications of development on internationally-protected habitats and floodplain areas</i> ” should be a matter for detailed consideration through the JSP, particularly in respect of the impact on the integrity of the Special Area of Conservation of the removal of substantial bat foraging areas through greenfield development. Key issue 4: In the event that the SDLs at both Nailsea and Backwell are confirmed through the JSP examination, this needs to be based on a robust evidence base justifying the new transport infrastructure, including new roads, necessary to achieve sustainable planned development. Whilst the detailed alignment and phasing of the new road infrastructure is a matter for the Local Plan, the need for such infrastructure must be confirmed at the strategic policy level. The role of the railway station including increased services and capacity, and opportunities for public transport to increase the number of journeys by sustainable modes, are also a matter for the West of England not just North Somerset. These need to be explored through the JSP process. Key issue 7: Here you seek to explore whether some of the development proposed at the SW Nailsea SDL could be better located in relation to existing services and facilities. BPC welcomes the recognition by NSC that the location is remote from the existing town centre and may therefore not offer the most accessible location available at Nailsea to accommodate strategic scale growth. BPC welcomes the Council’s recognition of the Nailsea Town Vision and willingness to revise proposals in light of its findings. BPC welcomes consideration of alternative development locations which could reduce or remove the need for housing to the south west of Nailsea and potentially negate the need for a new road corridor through the strategic gap between Nailsea and Backwell. Development to the north of Nailsea is more logical. Key issue 10 relates specifically to Backwell. It proposes to retain the village character, support and enhance the village centre and address traffic issues on the A370. The Sustainability Appraisal Scoping Report recognises that NSC faces considerable challenges to tackle congestion problems on main routes through villages. The capacity of the traffic lights and road corridor on the A370 through Backwell poses a significant concern to BPC. Given the considerable physical	Issues and Options Reps Submitted.pdf (239 KB)

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>constraints to the crossroads, BPC fear that any “improvements” would be negligible and overwhelmed by the forecast increase in traffic flows. The delivery of new road infrastructure from Farleigh to Nailsea would not mitigate the impact of new development at Backwell upon the A370 corridor. Its benefits would be limited to accommodating some traffic travelling between Bristol and Nailsea; it would serve no purpose for new residents of the Backwell SDL who would still need to use the A370 crossroads and Station Road to access the new road. The increased traffic on the A370 will further sever the village both physically and psychologically, which would not meet the social objectives of NPPF and the Local Plan.</p> <p>For these reasons, BPC is highly sceptical of the ability of the Local Plan to “<i>address traffic issues on the A370</i>” if the village is expected to accommodate a further 700 new homes. We will resist proposed developments without an integral and enforceable traffic scheme that either by-passes the village or delivers a public transport scheme that obviates the usage of private vehicles.</p>	
backwellresidents	Backwell Residents Association	<p>Backwell Residents’ Association (BRA) submits the following representations with the full support and endorsement of Backwell Resistance (BR). BRA and BR fully endorse the representations made by Backwell Parish Council (BPC) in response to this document and does not propose to repeat these points within its own representations. In particular, BRA and BR echo BPC’s concerns regarding North Somerset Council’s (NSC) decision to progress with proposals which have yet to be subject to independent scrutiny through the West of England Joint Spatial Plan (JSP).</p> <p>Notwithstanding these concerns and without prejudice to their objections in principle to the development proposals for Backwell and Nailsea (Policies 7.4 and 7.7 of the JSP), BRA and BR would like to take this opportunity to raise the following points.</p> <p>These representations should be read in conjunction with BRA’s representations to the West of England Joint Spatial Plan (Submission Version) November 2017 (JSP) which were also supported by Backwell Resistance.</p> <p><i>Agricultural Land</i></p> <p>BRA does not agree that Section 3 of the Paper addresses all the challenges and issues associated with delivering strategic scale housing at Nailsea and Backwell. The Council’s key issues fail to address the loss of high-quality agricultural land. The development of land West of Backwell and South West of Nailsea would result in the loss of large swathes of Grade 1-3 agricultural land and the fragmentation of existing farm holdings. However, no consideration has been given to the detrimental impact of development upon regional food production.</p> <p><i>Road Improvements</i></p> <p>Whilst reference is made to proposed strategic road infrastructure, improvements to the existing road network are largely overlooked. A cursory reference is made to addressing the traffic issues on the A370, however this does not tackle the capacity and safety issues already affecting Station Road and the Station Road/A370 crossroads, which would be exacerbated by the proposed strategic development. The Issues and Options Paper offers no explanation of how the capacity of the crossroads junction could be improved or how traffic flows through the junction could be reduced.</p> <p>Delivery of new road infrastructure between Farleigh and Nailsea & Backwell Station (M3) will not alleviate the congestion issues within the village, or offset the additional traffic associated with Backwell Strategic Development Location (SDL), which as currently indicated would be wholly reliant upon the A370 corridor to access employment and services. The planned new infrastructure to the east of the village provides no benefit to residents of the new development at Backwell, serving only the needs of some residents travelling to Nailsea from the Bristol direction.</p> <p><i>Schools</i></p> <p>Specific reference should be to the provision of schools within the local area and how this will cater for new residents of the proposed development. In respect of primary school provision, Backwell is currently served by an infant school, located close to the proposed Backwell SDL and a junior school on a separate campus to the south of the village. The JSP refers to the provision of a new primary school within the Backwell SDL which we understand could be located at</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>the western edge of the development site, resulting in a further, separate school campus within the village. This would result in a disjointed, inefficient provision of primary school facilities within the village.</p> <p>Should the Backwell SDL be confirmed, the Local Plan should take the lead to deliver comprehensive improvements to the educational offer in Backwell, by exploring the potential for a single campus for primary facilities in the heart of the village, closely linked to both the existing and new residential areas. A single campus offers the potential to significantly reduce trips to school by car, create attractive, safe routes to school and manage parking, to alleviate existing parking and traffic issues on local streets. Similarly, any new school provision should operate within the same multi-academy trust as existing schools within Backwell to facilitate shared use of resources.</p> <p>In respect of secondary school provision, Backwell School's catchment area currently accommodates pupils from Yatton, Nailsea and outlying areas. Careful consideration needs to be given to the implications of introducing 700 new homes into Backwell for this catchment area. If the catchment area shrinks in response to increased local need, what education provision is planned for the pupils of Yatton who may no longer be able to gain a place at Backwell? Expansion of Backwell School is not a realistic option given the current size of the school roll and the physical constraints to the site.</p> <p><i>Green Belt</i></p> <p>BRA supports the exploration of local amendments to the Green Belt around Backwell in the interests of securing sustainable, gradual growth at the village, in place of strategic expansion. Amendments to the Green Belt could offer the potential for non-strategic housing development to the east of the village, which could be better related to Bristol and planned infrastructure. However, Green Belt must be protected and could be extended where it serves to retain the separate identity of Backwell and Nailsea.</p> <p>The Issues and Options paper outlines the key issues NSC intends to address in respect of development at Nailsea and Backwell, if the strategic growth identified by the JSP is accepted. BRA is concerned that matters which affect the suitability of sites for residential development are deferred to the Local Plan stage, after the broad location has been identified for development through the JSP. Matters which affect the suitability of sites to accommodate residential development must be considered comprehensively at the strategic policy level to ensure the principle of development is sound and the delivery of such schemes is sustainable.</p>	
BHFP		Please do not take land out of greenbelt. It should be protected.	
Blagdon PC	Blagdon Parish Council	<p>Blagdon Parish Council (BPC) considers that the major issues are all included.</p> <p>Once again, transport infrastructure improvements are vital, particularly connecting the countryside with employment and education centres. It is hoped that the JTS will address these.</p> <p>Local Green Belt amendments should be more specifically identified.</p>	
Bridget Petty		<p>The area has been identified for strategic growth in the JSP, and the Local Plan needs to test the scale of development proposed and how it can be most effectively assimilated into the communities of Nailsea and Backwell.</p> <p>Proposed strategic road infrastructure- it's viability and chance of success need to be mapped further. The proposed location may not ease traffic on A370, and may create more of a bottleneck on station road for residents of Backwell, this would be really negative. Likewise, making Backwell Station a hub would also add to traffic on station road. A road not passing through the centre of the village would be of benefit, but not if it is wrongly placed, and rather than relieving, but brings additional cars and vehicles.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The environmental implications of development on internationally protected habitats and floodplain areas.</p> <p>I'd like to see how innovative housing scheme design across the whole country to consider the protected habitats</p> <p>Likewise the building on flood plains being built on, is a considerable risk, but if the scrutiny of long term forecasting proves positive, I'd still like to see innovative design work (not highest possible density and profit).</p> <p>4. The need for new transport infrastructure, including new roads, the potential future role of the rail station, opportunities for public transport improvements, cycling and walking.</p> <p>it is the timely nature of any improvements and whether the council can enforce improvements to the current rail way stations.</p> <p>If housing was being built closer to Bristol - Ashley Vale, any nearer Long Ashton then the chance of cycling and walking would be seriously increased. Public transport must improve to for accessing Chruhill and Banwell developments, that I believe are poorly placed given sparce connections to publich transport.</p> <p>5. The need to increase the wider range and type of housing in Nailsea, particularly affordable housing.</p> <p>The era when private developer disregard the requirements for section 106 housing (affordable housing) must stop. Councils must hold developers to account, and not allow schemes to progress while dwindling the delivery of these important and needed homes. Any housing build must include it. Shared Ownership would be well utilised in this area.</p> <p>8. The need to encourage a range of local employment opportunities including start-ups and small businesses.</p> <p>There is a need for better connection speeds to the internet, this will attract small business and start ups, it is currently no where near good enough.</p> <p>9. The need to improve opportunities for sport, leisure, community and cultural activities and events.</p> <p>Any changes to sports facilities in Nailsea should no way impact the Backwell provision which continues to need investment but is well used and an asset to our community.</p> <p>10. The need to retain the village character of Backwell, support and enhance the village centre and address traffic issues on A370.</p> <p>This remains our biggest concern for a village already being negatively impacted by heavier and heavier traffic on the A370 and roads surrounding.</p>	
British Horse Society	British Horse Society	<p>Nailsea is a more difficult area for new build as it has no easily accessible A roads to help funnel away traffic. Talk of getting a new road link and motorway junction through to Clevedon seems unrealistic, simply on the basis of expense – it would be unjustifiable for such a small town. Similarly, it is completely unrealistic to think that people would drive back towards Clevedon if their ultimate destination is Bristol. Consequently, any new build here will result in a huge increase of traffic through Wraxall and up over the hill to Failand and Portbury, areas which are already suffering from high volume, fast traffic on small rural roads. As a result, it seems more logical to the BHS not to build in Nailsea at all, but to put this particular new settlement much closer in towards Bristol, preferably inside the new ring road. This would also mean that residents there would have far greater access to existing infrastructure – schools, doctors,</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>public transport etc. Failing that (by far the most sensible solution), any new build should be on the east, not west, side of the town where there is a greater possibility of building a link road towards the A370.</p> <p>The BHS's other comment would be, again, that the new walking/cycle paths automatically become multi-user and should be linked to the existing network in order to get the gain from increased usage and encouraging people into a more healthy lifestyle. There also needs to be a multi-user path linking Nailsea and Clevedon, and subsequently to the Strawberry Line. This would benefit both leisure and commuter use.</p>	
Brockley Parish Council	Brockley Parish Council	<p>The JSP is flawed and our objections to it stand; in particular:</p> <p>A. The environmental effects are serious and possibly illegal in terms of its impact on the foraging range of the greater horseshoe bat.</p> <p>B. The transport needs have not been adequately addressed and the likely funding shortfall will probably mean that if planning approval is given, development will proceed before adequate transport infrastructure is in place.</p> <p>C. Backwell will be changed from a country village (albeit a large one) to a dormitory town with overloaded facilities.</p> <p>D. Brockley's population will nearly double and we will be subsumed into Backwell.</p> <p>E. The proximity of new development to Chelvey will detract from the open environment around this ancient hamlet.</p> <p>F. We are concerned about the potential loss of agricultural land to house building in North Somerset and specifically associated with the proposed Grove Farm development. This is an irreplaceable asset whose importance is likely to increase with time in the light of climate change and rising sea levels, and continuing population increase.</p>	
Butcombe		<p>The concept of a 'Green Belt' is usually defined as an area of countryside where urbanisation will be resisted for the foreseeable future, maintaining a region where agriculture, forestry and outdoor leisure can be expected to prevail.</p> <p>For many years, due to its status as Green Belt, the valley between Nailsea and Tower House Wood has not been considered at all suitable for development. There are many obvious reasons for this, including:</p> <ol style="list-style-type: none"> 1. Serious flood risk due to the gradient that leads from the town (which is 31 metres above sea level) down to the river Land Yeo. 2. Potential pollution of above river. 3. Major traffic problems would arise at either end of the valley without considerable investment in the infrastructure. 4. Not close to the urban centre of Nailsea, nor the railway station. 5. It is an area rich in wildlife. Tower House Wood is an ancient woodland and it is essential to preserve it as an amenity for the community. <p>I am pleased to read that North Somerset Council consider that this situation should be maintained, and so, I am in full support of the Council's policy in this matter.</p>	
C Allsop		<p>Under Section 3, Nailsea and Backwell, the document outlined some issues to be addressed regarding the housing proposals, such as effective assimilation into Nailsea and Backwell, the impact of the proposed road infrastructure, impact on the environment, creation of a new transport hub at the existing rail station, "encouraging employment" in the area, supporting and enhancing Backwell's village center, improving opportunities for sport and leisure.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>I seriously question how the 700 houses in Backwell (and almost doubling the size of Nailsea) can be assimilated, either in the "village center" which extends onto the A370 and is already under parking pressures to access Spar, the wine shop, the funeral services shop, the vets, Broadstreet Hair salon, Taylor's news agent. The rest of the "center is on the A 370 consisting of a Post Office, the surgery, a hair salon and a barber shop, a beauty center, 2 estate agents, chemists, and on Dark lane and Station Road, a financial adviser, a phone shop, a guitar shop. It is hardly a village center with very limited parking at the best of times and with the proposed development Backwell will increase in size by about 40%. Further "enhancement" is not possible as there is no room.</p> <p>So will the enhancement envisioned by the planners consist of taking another field and putting some shops on it? And will we assimilate the additional school children by crowding the existing schools or building new ones, again on another field perhaps? At the moment, we can get doctors' appointments within a reasonable time, but how will this issue be addressed. There is a large ageing population in Backwell with many health needs as a result who need access to the health center in a timely fashion.</p> <p>As for the improvement of sport and leisure, it appears that the Council and the Planning staff will have wiped out wonderful green areas that we enjoy for walking, which is why we live here. Is the plan to build a sports center on another field ?</p> <p>Finally, the impact of the proposed transport hub at the rail station will further destroy this village, with a proposed road cutting across the Common, a Green Belt area and one which become flooded in heavy rain. I cannot fathom how this hub will operate out of the most congested area in the village, nor where adequate government funding will pay for the proposed major roads! As for the biking and foot paths from the proposed Grove Farm development, how will that happen? Aren't there houses in the way? Of course, Backwell Lake will be affected by the proposed road skirting it. I also wonder how I will be able to drive to the Nailsea Town Center where I do a lot of my shopping. Will it take me an hour to drive a few miles past this transport hub?? Then in Nailsea, how will I find parking if Nailsea is going to double in size? The size of the proposed building plans are simply not viable.</p> <p>Also, Backwell Council has approved sustainable housing developments which the village can assimilate. This JSP and Local Plan will destroy a beautiful valley and will lead to terrible traffic congestion on all the roads. As for encouraging employment, let's get serious here. The majority of the employment for these new residents as for existing residents will be in Bristol.</p>	
Cleeve Parish Council	Cleeve Parish Council	<p>Cleeve Village is approximately three miles from Backwell and ten miles from both Weston and Bristol. It forms a strategic gap giving a rural landscape between urban developments. There should be no encroachment on the rural landscape on A370. There should be no green belt change along the A370. A full and comprehensive understanding of the transport and land use implications is required in order to understand the impacts on residents' quality of life and the local and global environment.</p>	
Cliff Barker	Mr	<p>With regard to considering Green Belt amendments please ensure the integrity of the Green Belt to the North and East of Nailsea. This area, apart from its scenic attraction, contains archeologically sensitive locations, wildlife habitats and corridors and the River Yeo, which feeds into an SSSI. Pollution of this river would have serious consequences downstream.</p>	
Congresbury Parish Council	Congresbury Parish Council	<p>We agree that the road/rail infrastructure needs addressing. As for housing, we will leave comments to both Backwell Parish Council and Nailsea Town Council to provide specifics. From Congresbury point of view, the main issue is increased traffic using the A370 and the lack of future planning to reduce the impact on journeys to Bristol.</p>	
CPRE Avonside	CPRE Avonside, North Somerset District	<p>Nailsea should be considered as a self-contained location promoting local employment and providing for local jobs.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Frequent congestion on the M5 and to Bristol emphasises the importance of having sustainable modes of transport in place before development.</p> <p>New west/east roads would be highly destructive to important heritage and landscape. We do not support the proposal for a new transport corridor to cross from Nailsea to Backwell. It would have a detrimental environmental impact on Backwell Lake and this sensitive area.</p> <p>We would expect the new 'Visions' being prepared would respect the landscape and work to enhance the setting of the towns.</p> <p>Backwell has limited services and would not be capable of supporting the extent of housing proposed. Despite the village 'straddling' the A370, it is a rural village with a strong community 'feel'. The strategic gap between Nailsea and Backwell should be maintained.</p>	
D Yeates	Savills	<p>It is welcomed that reference is made within the Consultation Document to the identified strategic growth for this area, as supported by the emerging JSP. Backwell is a sustainable location and entirely suitable area for small scale commensurate growth. Backwell holds a range of services and facilities to meet local needs and promote a walkable neighbourhood, preventing the need to travel by car. Indeed, it is noted that the Council's Sustainability Appraisal Scoping Report (September 2018) confirms a retail vacancy rate of only 2% in Backwell, demonstrating a strong local centre to support the long term sustainability of the village. There is also convenient access to Nailsea and Backwell Station which provide links to the wider area via the mainline, including Bristol, a short distance to the north.</p> <p>We therefore support the statement within the Consultation Document that the Local Plan should test the scale of development proposed and how it can be most effectively assimilated into the communities of Nailsea and Backwell.</p> <p>We also support the statement that, in order to address the issue facing this area, the Plan should '<i>consider the opportunity for local Green Belt amendments</i>'. We comment further upon the Council's approach to the Green Belt in response to Question 5, however it is our view that such amendments should be focussed to the east of Backwell, towards Farleigh / Flax Bourton.</p> <p>We also consider it important to consider the impact of the proposed strategic transport infrastructure, its location and alignment, phasing, delivery and implications on the wider network. It is clear from the emerging JSP that there are draft options for a set of transport improvements in the area involving, amongst other things, rail station cycle/walking links to Backwell, a new highway link from Station road east to the A370 at Farleigh (involving the construction of a new highway crossing of the Great Western Main Line), bus priority improvements along the A370 towards Bristol, and general improvements to the existing highways and junctions to manage increased vehicular flows along Station Road, Backwell Crossroads, A370 through Backwell, Farleigh & Flax Bourton.</p> <p>As a result, the land around Backwell, Farleigh and Flax Bourton will be key to delivering growth which supports these key transport improvements.</p>	
Diane		<p>Key issue 1: "... the Local Plan needs to test the scale of development proposed..." The testing of the scale of development is the role of the JSP not the Local Plan as I understand it.</p> <p>Please add another challenge/issue: "The impact of the proposed strategic road, metrobus and transport hub infrastructure on the quality of life of the many nearby residents, wildlife, the environment and the green belt, and whether this can be effectively mitigated".</p> <p>Comment: This issue is particularly pertinent to the proposed road and metrobus link between Station Road and the A370 across the green belt, which if constructed would pass very close to many hundreds if not thousands of residents in South & East Nailsea and North Backwell/Backwell Common/Farleigh,</p>	<p>Somerset Issues & Options Sep 18 - Diane Snape comments.pdf (91 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>with the pollution, noise and visual intrusion being magnified by the terrain, which necessitates the siting of the highway in the bottom of the valley (with incumbent flood risk) and most of the properties sitting above it</p> <p>- see section 8 of this document : transport issues: public health issues "...poor air quality as a result of congested roads...".</p> <p>Key issue 4: please reword as follows: "... the potential future <u>site and</u> role of the rail station...".</p> <p>Comment: the purpose of my proposed re-wording is to include consideration of relocating the railway station to a new site further west, closer to the Nailsea and Backwell SDLs, where space is less constricted and it is more feasible to establish a transport hub. (Clearly this is relevant only if the proposal to develop to the South West of Nailsea is upheld.)</p> <p>Key issue 7: The existing Nailsea town centre should remain the focal point. New developments should be located so as to facilitate access to the existing town centre and should not set up new local centres competing with the existing centre. Backwell residents also rely on Nailsea town centre for essential facilities such as supermarkets. Access routes between Nailsea and Backwell must not be impeded by new developments/infrastructure.</p> <p>Key issue 10: Maintaining separation between the settlements of Nailsea and Backwell via green belt and strategic gap is another key issue which is important for quality of life, environment and wildlife.</p> <p>Key issue 10: there is a need to address traffic issues throughout the area, not only on the A370 and not only in Backwell.</p> <p>How the local plan might address these:</p> <p>The local plan must ensure that any infrastructure proposals include a thorough impact assessment and mitigation measures, with full prior consultation with affected residents including disclosure of projected traffic flows, noise modelling, and detailed traffic management plans including speed limits.</p> <p>In relation to infrastructure, most of the proposals in this issues and options document do not appear to include any alternative options. Alternatives should be developed and consulted upon, so that the least damaging/most effective alternatives may be selected.</p>	
DMS	Mr	<p>We are fully supportive of North Somerset Council's objection to the suggestion of a review of the green belt north of Nailsea as proposed by Nailsea Town council's vision for the future.</p> <p>This beautiful stretch of countryside is in the green belt for a reason. With it's fauna,flora and the river which flows through, as well as the popular fishing lake, the surrounding communities are very fortunate to have this. It would be unforgivable to encroach on it with bricks and tarmac, not to mention the noise pollution that would destroy such a peaceful environment. It is a great asset that benefits the wider community and once lost can never be replaced.</p> <p>At present there is no need to use green belt land for new development, there is sufficient land available that is not in the green belt and in a better position for road,rail and airport links.</p>	
Dovecote		<p>Regarding point 1</p> <p>Identifying the area to the south and west of Nailsea as an area of strategic growth makes complete sense when the existing transport hubs are considered. The main line railway, train station and airport are major assets for an area to have.</p> <p>Regarding point 2</p>	<p>Local Plan Comments.pdf (112 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Leveraging the existing transport hubs will only work if the facilitating transport network is improved. It is unlikely that there will be a perfect solution, but the Joint Spatial Plan does go some way address the issue, especially when the option of a link to the M5 from the existing transport hubs is considered.</p> <p>But it can't be just about the strategic transport network. Crucial will be the resolving of long standing issues with the existing local network, and the Joint Spatial Plan also goes some way to addressing these, such as bypassing the pinch point at Stone Edge Batch, improving access to the M5 at Junction 20, and the linking of the proposed strategic development to the south and west of Nailsea to the western route of the B3130 with new/improved local roads.</p> <p>In particular, dealing with the issue at Stone Edge Batc makes the B3128 a more attractive proposition to commuters when it comes to travelling between Bristol and Clevedon, reducing the any that might be going via Nailsea.</p> <p>There is no need of a new road to the north of Nailsea to connect the eastern and western B3130. While traffic can be heavier at peaks times, the delays are by no means long—and peaks do not last that long either. It is also questionable as to whether much of that traffic is in fact passing through Nailsea to continue on along the B3130 Clevedon road—subjectively the traffic appears to be simply entering Nailsea itself. As previously mentioned, improvements to the B3128 are likely to make it a much more attractive proposition to commuters anyway.</p> <p>Regarding point 4</p> <p>Encouraging the use of public transport and reducing reliance on cars is essential, especially if this can involve walking and cycling given the health and wellbeing benefits those activities bring.</p> <p>By placing residential development to the south and west of Nailsea, the train station can be leveraged. The proposed metrobus would enhance that as well.</p> <p>By ensuring that there are local retail centres and other amenities to the south and west will allow residents to walk or cycle, as well as giving them an improved sense of community.</p> <p>A wraparound approach to development will simply lead to higher car use to reach a town centre that will seem remote to many.</p> <p>Regarding points 6 & 7</p> <p>Nailsea town centre plays an important role for the whole area and would benefit from improvement, but it would be a mistake to solely focus attention on it or seek to preserve its role at the expense of a strategic vision.</p> <p>There are issues which are likely to be exacerbated by a wraparound approach to development that seeks to retain the exist centre as the main focal point—notably parking.</p> <p>There is no reason that Nailsea could not be an exciting and vibrant community with a more localized approach to retail, services and amenities. With the current approach people simply get into their cars to reach the supermarkets. What we need is more local accessibility.</p> <p>Given that there is a clear strategic benefit to development to the south west of Nailsea, it would make sense to look at local retail and other facilities as part of that development</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The existing industrial estate to the north east of Nailsea is not appropriately located—the existing transport hubs are to the south—the train station and the airport. To draw in business and create jobs, the proposition has to be attractive and so locating any new industrial estates and business parks to the south west makes a lot more sense.</p> <p>Indeed, it looks like some of the offices located in the northern industrial estate are now being converted to flats. So, it would be better to scale back that estate, make it a brown field site and populate it with residential properties.</p> <p>The desire to protect Nailsea’s town centre is understood, but there is also a risk of the super markets becoming too dominant—the Nailsea Tesco supermarket is similar in size to the one that used to be at Bradley Stoke. That got replaced—take a look at what is there now—a town ‘centre’ that in reality is just a giant supermarket.</p>	
Dr Turk		<p>I agree that transport infrastructure is now becoming a problem in this area. The decision to remove school transport for those traveling in to Backwell school has placed a great burden on public transport at key periods of the day. The construction of the bypass linking the A38 and the A370 has also had a detrimental effect on road traffic for this area. I am concerned that the building of so many new homes would put an undue burden on transport infrastructure on the A370 corridor. This would need some careful consideration and better foresight than that used for the bypass.</p>	
E Griffiths		<p>The idea of 6 to 700 houses all with cars coming on to the already congested A370 appals me. Backwell already has roads which can only just cope with the existing traffic.</p> <p>The land around Backwell and Nailsea station, with the bus stops close by, has ample room for growth but for various reasons this is being ignored, The exit of Moor Lane onto Station Road should have been addressed at the time both Amberlands and the Bryant development were built. The council never enforced the then proposed second railway arch or the right hand lay-by on Station Road into Moor Lane. Why not?</p> <p>The width of Station road will always be a problem unless some of the adjacent land is purchased and used to widen it. The Station is a godsend to Backwell and its close proximity to the village should be utilised. There is land available already marked as ‘potential building land’ in Moor Lane for houses to be built within walking distance of the available transport links. I appreciate Backwell has to grow to meet future needs along with other country villages but it must be done with more consideration.</p>	
Ecomotive Ltd		<p>The Local Plan could address the identified issues, particularly those listed in the table below, through allocating specific sites, or minimum areas within larger development sites, specifically for CLH and/or self build. (see table in attached document)</p>	
FF		<p>I agree with the issues raised in the JSP for Nailsea & Backwell, however I would increase the emphasis on public transport, and question the feasibility of road development. I object to the consideration of local Green Belt amendments.</p> <p>Point 4 & 2 - Even without significant housing and population growth; there is need for greater emphasis on increased public transport & safer cycling routes to relieve the local road network. As a daily commuter to Bristol, I have been let down by the unreliable bus services on so many occasions that I now have to rely on driving, as I have no other safe options that allow me to meet my childcare commitments after work.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The B3130 & B3128 roads are already heavily congested and therefore unsuited to the additional levels of road traffic that the JSP is proposing, without radical improvements in sustainable transport. Road improvements will only achieve so much, and greater focus needs to be on offering new or improvement services leveraging the bus routes and N&B Train Station. Additionally, greater off-road development for cyclists (such as extending the Festival way into Backwell, Wraxall and beyond) and encouraging their use would free up the dangerous roads from drivers and cyclists.</p> <p>I object to the the consideration of local Green Belt amendments. This land has been strategically allocated to serve a purpose and it would be contradictory to reallocate this elsewhere to meet development needs. Other sites must be found.</p>	
FH		<p>It could be considered discriminatory that the green belt amendments proposed by NSC/JSP does not include Ashton Vale, an area recently invested with a new link road and a bus route and have no housing settlements planned for this area. The investment of public funds to purchase the land and create this new road should not just enable more traffic on the access roads to Bristol, but to also provide access to suitable housing developments with strengthened public transport links.</p>	
First Step Homes	First Step Homes (Wessex) Ltd	<p>Q2, Q3 and Q4: We support the opportunities for amendments to the Green Belt around these well-connected and serviced settlements</p>	<p>207_NSC_LP_Response_Backwell.pdf (469 KB)</p>
J Court		<p>Objection to the proposals of new houses and roads in and around the Backwell / Nailsea area. Backwell would lose its whole feel and sense of the thriving local village that it currently is. The proposed number of new houses plus all new connecting roads would mean both Nailsea and Backwell would just become a part of one large urban sprawl in which both would lose all identity.</p> <p>The proposed new link road between Station Rd and Flax Bourton would have a huge detrimental effect on the tiny village of Flax Bourton as traffic makes its way through there and on to the Long Ashton bypass, which is already jammed with traffic during rush hours, without the added volume that new houses would bring. Also there appears to be little thought ever given to the affects on the countryside and animals and birds that live in these habitats. Backwell is lucky to have countryside around its borders which we know from experience homes a variety of wildlife some of it sadly not too common these days.</p>	
J Davies		<p>Overall, we are in support of the plan for North Somerset but are astonished by the proposal by Nailsea Town Council to push their development into greenbelt in Wraxall, on the outskirts of Nailsea. We strongly believe that green belt should be protected, to act as a corridor for wildlife and to keep distinct areas, avoiding the merger of towns and villages (Nailsea, Wraxall, Tickenam in particular).</p> <p>The green belt in the valley next to the River Yeo on the outskirts of Nailsea is a beautiful amenity for locals and we run there on a regular basis, walk there with our family and friends, pointing out important local wildlife to our children, such as Kingfishers.</p> <p>The 2036 plan outlines plans for metrobus links from Nailsea to Bristol. Considering that this is nearly 20 years away, we feel that it needs to be considered how out of date this part of the plan may become. Surely we should be thinking about planning fit for the future, to include automation for example.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
J Kemmish		<p>I wish to raise my concern and objection to Nailsea town councils plans to remove the greenbelt to the north of Nailsea.</p> <p>I would like to express the importance of keeping green belt that is presently accessible for all and crucial for all residents to have easy access to.</p> <p>This particular area which is under Wraxall parish council is a haven for wildlife-Otters, deer, owls, Herons to name a few.</p> <p>Although these appear not to be important to Nailsea council I wonder where they feel their residents can find such similar wildlife diversity or ecological diversity?</p> <p>It is an area of outstanding beauty and it borders with the woods that are safely walkable from Nailsea.</p> <p>If we are to grow as a town we need green space too, People value green space for many personal reasons,. My husband had a mental health breakdown last year and having green space/woods and water helped him to recover as it had done for many others.</p> <p>We must not underestimate the impact on our town if the green belt is not protected.</p> <p>Where are children supposed to play, learn and have freedom?</p> <p>The national strategy to keep people active, maintain health and mental well being. We need to enable the local people easy access to green spaces that you do not have to access by car!</p> <p>If Nailsea town council proposals are considered people/children will have to get in cars to go and seek fresh air/woods and freedom.</p> <p>How are the young people of the future to learn about the environment/enjoy growing up in protected areas of wilderness and not man made green areas that are not the same.</p> <p>The land to the north of Nailsea is pretty unique with the fields ,river and ancient woodland that will ultimately die if not supported by the surrounding buffer of the land.</p> <p>The areas either side of this land are of scientific interest .rather than remove the green belt in the middle it would make sense to protect it further so that it can be there for years to come and for Nailsea residents to enjoy.</p> <p>The green belt are the lungs of Nailsea, with all proposed increase in cars/pollution etc we need to have green space to level the environmental impact.</p> <p>Why are we not considering the impact of removing the green belt??</p> <p>I am also aware that Nailsea town council know of the environmental issues with the land with regards to very significant flooding every year, the importance of historical settlements underneath the land. How is it acceptable to turn over green belt when there are so many reasons for it to be protected.</p> <p>I feel that Nailsea town council have been very underhanded about these proposals. A few years ago when these issues were being raised Nailsea town council moved the time of a very important public consultation meeting on the day and many of the public were unable to attend.</p> <p>Nailsea town council have not advertised their intentions regarding this land very openly-one article in the times paper and one in the Nailsea magazine.</p> <p>I wonder are Nailsea council not meant to have a public meeting? It feels wrong that a such a huge decision is made in a very private way.</p> <p>I would like to be advised of the next steps and processes.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Many of Nailsea’s residents who live to the north of Nailsea are still unaware that Nailsea are proposing such dramatic changes to green space, how is this democratic if people are not informed.</p> <p>I wish very much to support North Somerset council views that this land needs to be protected for all the reasons I have listed.</p>	
J Milward		<p>I support the option "Consider the opportunity for local Green Belt amendments". There are a number of small scale sustainable infill opportunities on the periphery of Backwell located in the Green Belt and outside the settlement boundary. These could be realised without materially affecting the integrity of Backwell as a village and without the need for the much more intrusive JSP proposed extension to the west of Backwell. Small scale infill mitigates the affect on existing local communities much more effectively than a large free standing 700 home proposal and has a much less deleterious affect on the Green Belt.</p> <p>I note that the West of England Joint Spatial Plan (November 2017) seeks in Policy 5 - Place Shaping Principles to -</p> <p>"Create character, distinctiveness and sense of place which diversifies the residential offer, improves accessibility, affordability and enhances identity".</p> <p>I also note that the North Somerset Council Core Strategy (Jan 2017) in Primary Objectives wants to –</p> <p>“Deliver sustainable housing development across North Somerset to meet housing needs”.</p> <p>I consider that the above option is more likely to achieve the JSP & Core Strategy aims.</p>	
John		<p>I support North Somerset Council's policy towards the preservation of the Green Belt in Nailsea consider it to be one of the most important aspects of the Local Plan 2036.</p>	
Jonathan		<p>The concept of a ‘Green Belt’ is usually defined as an area of countryside where urbanisation will be resisted for the foreseeable future, maintaining a region where agriculture, forestry and outdoor leisure can be expected to prevail.</p> <p>For many years, due to its status as Green Belt, the valley between Nailsea and Tower House Wood has not been considered at all suitable for development. There are many obvious reasons for this, including:</p> <ol style="list-style-type: none"> 1. Serious flood risk due to the gradient that leads from the town (which is 31 metres above sea level) down to the river Land Yeo. 2. Potential pollution of above river. 3. Major traffic problems would arise at either end of the valley without considerable investment in the infrastructure. 4. Not close to the urban centre of Nailsea, nor the railway station. 5. It is an area rich in wildlife. Tower House Wood is an ancient woodland and it is essential to preserve it as an amenity for the community. <p>I am pleased to read that North Somerset Council consider that this situation should be maintained, and so, I am in full support of the Council’s policy in this matter.</p>	<p>Comments to submit to NSC in response to the Local Plan 2036.docx (15 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
Jonathan		<p>Please keep protecting our green space and don't allow review of Green Belt in the valley to the north of Nailsea opposite Tower House Wood. It is an important buffer zone between Nailsea and Wraxall-which is what Green belt was designed to be, and it is nationally under a renewed and growing level of threat. A wide range of leisure activities take place in the Green Belt. These all reflect in some way, the value of a belt of open land to the people in the urban areas the land surrounds. Green Belt policy was established in 1955 primarily to stop urban sprawl.</p> <p>That area is important recreational space to my friends and family. We have enjoyed walking there through the woods and along the Land Yeo for many years, watching the wildlife and ecology. It is not just a piece of land on a map ripe for development by LVA. Mental health is a big issue at the moment, making areas such as this vitally important to save for current and future generations.</p> <p>Communication Links</p> <p>We know that North Somerset Council, are supporting this area to remain in Green Belt and thank you for doing this. We cannot see why there would be any special circumstances to change that view, especially as the town is to the south, along with Backwell station and the airport, with Bristol to the east. The access roads either side of that land (B3130), especially at Tickenham Hill and the T junction, are already traffic 'pinch points' where increased volume would make matters worse. A road across the valley here would by-pass the town centre, which needs footfall, and emergency vehicles could get held up from progressing in either direction on the B3130.</p> <p>Loss of Green Belt</p> <p>If a new development is allowed to be built on our small area of Green Belt land, we will all lose vital green space forever, which can never be replaced. There would be pollution to the River Yeo, which leads into an important SSSI and possible hydrological threats to the flood plain which is a wildlife corridor and important habitat. The ancient woodland of Tower House Wood, would become an urban wood, full of rubbish.</p> <p>Public Health</p> <p>Why build houses, extend the industrial estate and create a leisure centre (that people have to pay to attend) when these fields to the North of Nailsea are easily accessible, open, green healthy space and a public amenity, far better for public health, leisure and exercise than urban planning can provide? Coates House on the trading estate, is already being developed into flats due to underuse. No clever urban planning can ever replace our precious Green Belt. Please keep protecting it!</p>	Response to NSC.docx (50 KB)
Keith Riches		<p>Page 12. <i>Section 3. Nailsea and Backwell</i> Key Issue 5. This issue is equally applicable to Backwell. The need for provision of truly affordable housing throughout the region is vital.</p>	JST comment 2016 Riches.pdf (42 KB) comment 2017 Riches.pdf (52 KB)
Kit Stokes	StokesMorgan Planning Ltd	<p>The emerging Joint Spatial Plan's proposed approach for four Strategic Development Locations (SDL's) in North Somerset to be the main contributors for future growth is fundamentally flawed.</p> <p>Prematurity</p> <p>North Somerset Council has promoted the SDL's from an early stage before analysing the environmental impacts of these options and without comparing the environmental impacts with other strategic options (i.e. Releasing of land from the Green Belt).</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The LPA has ‘put the cart before the horse’ i.e. confirmed the SDL options and then sought to retrofit a package of mitigation measures where clearly there are more sustainable environmental options including releasing land from the Green Belt at various location following a robust examination of the environmental, social and economic impacts of all options.</p> <p>A more pragmatic vision focused on strategic and non-strategic development provided in locations where existing transportation infrastructure can be improved and optimised more cost effectively – rather than a reliance on ambitious new infrastructure – will de-risk the process of enabling new strategic development and is therefore more likely to be deliverable. Furthermore, less concentrated forms of development are less likely to adversely impact valued landscapes and sensitive habitat.</p> <p>Furthermore, consultation on North Somerset Local Plan 2036 ahead of the Independent Examination of West of England Joint Spatial Plan is premature. The Inspectors have identified significant flaws in the strategic approach taken to the JSP, where SDL’s have been promoted without adequate consideration of environmental considerations such as transport and ecological impacts.</p> <p>A more appropriate approach would be to set out the environmental impacts of various SDL and non-SDL options of addressing housing need in North Somerset (including Green belt release) and then adopt a balanced approach to allocating development for the most sustainable options.</p> <p>Impact on the North Somerset and Mendip Bats Special Area of Conservation (SAC)</p> <p>Development of less environmentally sensitive land in and around existing settlements (including Ashton Vale) would prevent the need for large scale development that will adversely impact the North Somerset and Mendip Bats Special Area of Conservation.</p> <p>The North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document (SPD) which identifies that development of key habitat (i.e. bat hunting areas (pasture land)) should be avoided because it cannot be adequately mitigated against.</p> <p>The North Somerset SPD sets out strong requirements for consultation, survey information and appropriate mitigation, to demonstrate that development proposals will not adversely impact on the designated bat populations.</p> <p>This has not been carried out and it is not possible to determine if appropriate mitigation is possible, and whether large scale developments on key habitats for Greater Horseshoe bats and Lesser Horseshoe bats (hunting habitat such as grazed pasture, hedgerows, woodland edges, tree lines, hay meadows and Connecting habitat, which is important to ensure continued functionality of commuting habitats) can be appropriately mitigated.</p> <p>The SPD indicates that such development is unlikely to be acceptable because appropriate mitigation cannot be achieved. For example, providing dark corridors for connective habitat will still fundamentally cause harm through the removal of grazing land which generates the prey on which GHSB are reliant.</p> <p>Landscapes around the SAC itself are a significant a constraint to development. The SDL areas at Banwell, Churchill, Nailsea and Backwell are identified by the Council in its SPD as providing important foraging habitat needed to maintain the favourable conservation status of the horseshoe bats, yet in these areas several thousand houses are proposed.</p> <p>The North Somerset Council Bat SPD identifies that the populations of bats from the North Somerset and Mendips SAC are currently under particular stress from a number of factors, particularly the number of development applications and proposals on the urban edges of Yatton, Congresbury, Nailsea and Cheddar. The SPD also explains that it is the local planning authority’s responsibility to ensure that the ‘favourable conservation status’ (FCS)of local populations of bats is maintained.</p> <p>Before granting planning permission to a development the local authority needs to ensure that the proposed development is not detrimental to the affected population of Greater and Lesser Horseshoe bats’ FCS, i.e. that there are no adverse effects on the habitat to support and hence abundance of the local population from the proposed development.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The Council must be satisfied that each of the three tests for EPS is met which besides FCS includes statements concerning whether ‘the development is of overriding public interest’ and whether ‘there are no satisfactory alternatives.</p> <p>We are not satisfied that adequate information has been provided to demonstrate that large scale building on habitat would not adversely impact the FCS of the SACs. Consequently the LPA has not demonstrated that it has explored all other options which would not significant adverse impacts to hunting and connecting habitat.</p> <p>This development option cannot therefore be supported without a thorough examination of alternatives and outcomes.</p> <p>The transport link to the north exits onto Hanham Way/The Causeway has to cross the Tickenham, Nailsea and Kenn Moors (SSSI/Parish Brook wetland area). This would not be possible without devastating the wildlife of this area which supports Heron, Kingfisher and Egret not to mention is foraging habitat for bats.</p> <p>Transport Impacts</p> <p>The impacts of development at Nailsea and Backwell when compared with other development options has not been explored.</p> <p>It is not more sustainable to deliver transport options to this part of the district, when compared with development in Ashton Vale (which is already served by Metro bus). Access to jobs, recreation etc is all at hand in Bristol.</p> <p>We are also concerned at the lack of thought to the impacts on the narrow country lanes through Chelvey (south west) and the link road to the Causeway (a single lane highway). These roads cannot cope with existing traffic and cannot be upgraded due to the proximity of listed churches, railway bridges etc at either end. Whoever has suggested the masterplan in all of the options has no local knowledge or has only given a cursory thought to these impacts.</p> <p>Landscape Impacts</p> <p>The environmental implications of building on land to the south and west of Nailsea have not been assessed.</p> <p>The rolling countryside is prominent on this south facing hillside which is visually detached from Nailsea which sits invisible beyond the crest when viewed from Chelvey. The impact of development ill be devastating to the landscape.</p> <p>The harm to the countryside to the south of Morgans Hill and to the Countryside on the narrow stone lined lanes of the Westend Nailsea must be compared to the loss of a municipal golf course and landfill site at Ashton Vale on the edge of Bristol.</p> <p>No LVIA has been prepared to measure the impacts to valued landscape in these areas compared with less sensitive options (Green Belt north of Nailsea and Ashton Vale).</p> <p>Summary</p> <p>Consideration of the NSLP 2036 is premature ahead of the WOE JSP. Inadequate information has been presented to allow a considered assessment of the options.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Lands Improvement		<p>The Council's primary concern at Nailsea and Backwell appears to relate to the way in which the SDL will take shape. We are broadly supportive of an SDL being identified and consider it appropriate location given the scale and role of Nailsea.</p> <p>3.6 We would suggest that the requirement to deliver a strategic level of growth, the existing commitments set out in the development plan and the constrained nature of both settlements (namely in Green Belt and ecological terms), means that there is limited scope for additional sites to be identified in this location.</p>	
Long Ashton Parish Council	Long Ashton Parish Council	Broadly agree, however, the railway station at Backwell needs updating with improved access and facilities.	
M Hayman	.	<p>Question 3. Nailsea and Backwell.</p> <p>We support the Council references to the Nailsea and Backwell area particular the comments about the environmental impacts to the protected habitats and floodplain areas. Likewise for any improved use of the railway station for Nailsea and Backwell which will help reduce the number of vehicles in the overall area including those travelling to Bristol, Clevedon and Weston and further. Therefore we would support your idea for increased housing development opportunities particularly affordable housing in the South West of Nailsea which would be able to utilise the existing or enhanced rail and bus links.</p>	
M Merchant		<p>I agree that Nailsea needs and could sustain the number of houses suggested in the report.</p> <p>Serious consideration should be given to developing the land between Clevedon Road B3130 and Tower House Lane north of Nailsea and south of the Land Yeo.</p> <p>A new road could significantly reduce traffic from roads such as Southfield Road which is used as a cut through. The land in question is nearer to the town centre amenities than the proposed new build at Engine Lane and Netherwood Lane.</p>	
Mark Funnell, Planning Adviser, National Trust	National Trust	<p>Our response to the Nailsea and Backwell proposals, and their associated highway infrastructure, stems from the Trust owning and caring for special places including Tyntesfield to the east of Nailsea, and Cadbury Camp on the Tickenham ridge.</p> <p>Our comments the Joint Spatial Plan publication document in January 2018 remain relevant and including the following: "We are very concerned about the proposal for a new road link between the A370 Long Ashton bypass and the M5 motorway, which is stated as being 'critical infrastructure' for the new housing being proposed at Nailsea and Backwell. We question the appropriateness of these proposals and their sustainability given the reliance on new road infrastructure, which would also cause considerable harm within the Green Belt and to designated heritage assets".</p> <p>The above concerns continue to apply. However, should the Strategic Development Locations in the Joint Spatial Plan continue to be taken forward, there should be significant emphasis on reducing the potential environmental impacts of new development, including the associated new highway infrastructure. This should include its impacts on designated heritage assets and their views and settings, as well as the land take within open countryside.</p>	
N Cooper	Claverham Future	<p>Are there any developers who wish to take up the "startup Business" development? Are there any developers that wish to build commercial offices in this area? I think we all know that the provision of more housing here will provide locations for those that "Want" but don't need. The provision of more infrastructure, roads and rail, bus transport etc cannot be serious, it is a sad and bad attempt at humour. No developer will willingly provide funding to major transport</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>schemes and drip fed development to keep prices at peak market cost means that there is never enough money until way too late. North Somerset does not have the money to pay for all of the infrastructure, else it should provide costings and budgets to say so. This is far fetched and misleading.</p>	
Nailsea		<p>In statement 1 above it states that the local plan should Test the scale of the development. It is clear that Nailsea is a commuter town with very little local employment opportunities or space to grow employment. The local plan calls for 2575 new houses + 750 post 2036. This is in addition to those in the 2026 plan (961). At the time of commenting very few have been started. This means that a total of 4261 new houses are planned. Due to the cost of houses in Nailsea and the average gross salary £29,933 (Annual Monitor Report 2017) it is clear that most families will have 2 working adults. This could equate to a requirement of 8000 new jobs. Most of which will be miles away form Naisea.</p> <p>It is absolutely clear that Nailsea cannot sustain this amount of housing and thus fails the test for the scale of the proposed development</p> <p>From my previous contacts with NS council it was clear that the numbers allocated to Nailsea were just down to the ammount of space available which was not in the green belt irrespective of any problems that might arise due to all the traffic, lack of facilites polution etc.</p> <p>Backwell and Nailsea rail station must not become a transport hub as the local plan clearly states that transport hubs can take develop,ments if higher density. The only area to build on at the station is in the strategic gap and by the lake which forms a critical part of the flood plain.</p> <p>Nowhere in the local plan is low cost housing (as distinct from affordable housing) addressed. This should form part of the local plans for all areas.</p> <p>Nailsea does not need any more large 4 & 5 bed houses, it needs 1,2 and 3 bed low cost houses to attract young people and families.</p> <p>The local plan does not consider any of the affects of the proposal on existing residents. It should do.</p>	
Nailsea Action Group	Nailsea Action Group	<p>We agree that the planning for these two neighbouring areas cannot take place in isolation from each other.</p> <p>Key Issues 2 and 4 are vital. Infrastructure development should precede the construction of dwellings.</p> <p>We are concerned that the rapidly changing climate will jeopardise dwellings in or near the flood plain far more than current predictions suggest (Key Issue 3).</p> <p>Apart from those identified in Weston-super-Mare, the increased local employment opportunities do not seem to match the expected employment need generated by new housing (such as in Nailsea). (The NPPF recommends that all new building should be predicated by local employment opportunities.) This will drive more employees onto the road and rail networks than they will ever be able to accommodate with a particular impact on Bristol. More local employment opportunities need to be identified and such a plan should include the installation of super-fast broadband to enable employees to work from home or local mini-centres of employment. (Key Issue 8 refers, and responses later in this document.)</p> <p>'Identifying further opportunities to improve Nailsea town centre' centre could be constrained by an (expensive) intention to create a second centre and possibly. Therefore better – and cheaper - to build around the town as opposed to one extended corner, and focus on developing the existing centre.</p> <p>Existing policies aimed at improving Nailsea's self-sufficiency need to be substantially strengthened. In particular, the employment led policies currently applying the Weston should be extended certainly to Nailsea and preferably to the rest of the district. Nailsea's development history strongly indicates that inadequate control of phasing for the proposed development will fail to resolve the town's abysmal self-sufficiency. Since the 1960s, net out commuting has hovered around 70% with the number of out commuters rising as house building outstripped the dismal levels of employment development aggravated by loss of employment sites to residential development.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>We welcome the reassessment of the Nailsea housing as the balance of housing types needs a further shift towards smaller market housing, some for younger people and some for older people to downsize. These should include flats and terraced homes, retirement flats and residential homes.</p>	
Nailsea Town Council	Nailsea Town Council	<p>The Nailsea Vision is a continuing vital component of the Town Council's response to Issues and Options, and the emerging Local Plan and Joint Spatial Plan.</p> <p>With reference to point 7, NTC is strongly opposed to the proposed development of south west Nailsea and endorses the notion that development can be better located to the north of the town. In principle, NTC supports development around the existing settlement boundary ('wrap-around') which would fulfil the development goals of the Local Plan more efficiently and effectively than the south west Nailsea option. Development to the north is closest to the town centre, and an improved road infrastructure will open up the existing commercial estates/employment sites for further development and lead to the creation of jobs, which no other proposed scenario achieves.</p> <p>Reinforcing this argument, the south west Nailsea proposal contradicts issue 6 in that by having its own retail centre it would undermine the highly important goal of improving and enhancing the town centre.</p> <p>The focus on highways and transport should not be restricted to the strategic road network (without which the south west development is not viable). There are existing constraints on local roads in all directions to and from Nailsea i.e. Stone Edge Batch, Wraxall Hill, Wraxall Village, and the railway bridge at Backwell – these need to be the initial focus of any infrastructure plan. The country roads to the south and west are narrow and on their own could not support a south west development.</p> <p>The first bullet point is crucial. Fundamental to the housing developments is a comprehensive and integrated plan. Infrastructure, in particular roads, must be properly planned and implemented before any major housing development. This approach is essential in funding infrastructure, including utilising S106 and Community Infrastructure Levy funds in support of a masterplan.</p> <p>The Town Council has commissioned an independent professional transport study which has confirmed the feasibility of improving and developing the road system to the north of the town, in accordance with the proposals contained in this consultation response.</p>	
Nailsea Unit Trust (c/o Ellandi LLP)	Williams Gallagher	<p>The key issues and strategies for addressing these issues are supported. However, it would be helpful to add wording to the following issues to improve their effectiveness:</p> <p>4) The need for new transport infrastructure, including new roads, the potential future role of the rail station, opportunities for public transport improvements, cycling and walking. These measure will need to be considered in respect of strategic connections but also linking new and existing communities through to their respective town centres at Nailsea and Backwell.</p> <p>6) Protecting Nailsea town centre from the development of town centre uses which are not complementary to the role and function of the town centre. Major new housing development brings an opportunity to further improve and enhance Nailsea town centre. Opportunities for higher density development, including new residential uses in the town through redevelopment or upward extension / conversion.</p> <p>7) The potential strategic growth at SW Nailsea will be remote from the existing town centre. Improvements in public transport and walking / cycling routes to Nailsea town centre must be a priority with some additional, complementary services provided in a defined local centre for the proposed urban extension.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Natural England	Natural England	<p>While we are pleased that the implications of development at Nailsea and Backwell on internationally protected habitats and floodplain areas have been recognised as key issues, further evidence will be needed to identify and protect key bat habitats and landscape features and to inform measures needed to improve and protect water quality.</p> <p>We are aware that bat habitat mapping is being undertaken by the Council for the SDLs, which is welcome, however this is not sufficient in itself to determine the use of the site by bats, which can be highly variable throughout the year. We recommend that bat activity surveys are commissioned at the earliest opportunity to identify key foraging areas and commuting routes and to inform the design and mitigation measures from the outset.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>The proposals for Nailsea and Backwell remain untested, both in terms of the amount of development that is realistic and its dependence on the timing, details and delivery of the required road infrastructure, despite the relegation of the Junction 20 ring road to a potential long term project. In addition the proposals for Nailsea effectively bypass the town with no consideration of how development will be effectively assimilated in to the community.</p> <p>The proposed scale of development at Backwell is clearly an issue in relation to the objective to retain the village character of Backwell. The proposed 700 dwellings will result in a 37% increase in the number of dwellings in the village and will clearly impact on the current character of the village. Whilst there is also an identified issue to support and enhance the village centre, the numbers proposed and location of the site will not be effective in supporting the centre, compared with alternatives such as land controlled by Persimmon Homes Severn Valley off Farleigh Road.</p> <p>We note the suggestion for considering local Green Belt amendments which needs to be addressed sequentially against alternative Green Belt and non-Green Belt alternatives. If Green Belt amendments are required these should be at the main towns rather than the service villages, particularly as non-Green Belt alternatives exist in both Backwell and other service villages.</p>	
PK1		<p>I am pleased to read that North Somerset Council consider the current situation regarding the Green Belt North of Nailsea should be maintained. So I am in full support of the Council's policy in this matter. There are other more environmentally acceptable areas around Nailsea which could be developed.</p>	
Portishead Town Council	Portishead Town Council	<p>These proposals will adversely affect commuting in and out of Portishead</p>	
R Hart		<p>In reference to Question 3 on this document I am extremely concerned about the suggestions to revise the green belt boundary and especially the proposal to take land out of the Green belt on the Northern boundary of Nailsea currently within the Wraxall boundary. Without repeating all the important purposes of the Green belt the need to maintain a strategic boundary between Nailsea and Wraxall is extremely important and to prevent the town sprawl over the countryside. The nature of the village of Wraxall and the town of Nailsea are fundamentally different in character and this difference should be preserved. The suggestion that any development on the existing available land on the other side of Nailsea is "remote" from the town centre is spurious. This valley in Wraxall, currently in the Green Belt is of outstanding natural beauty. Indeed, John Betjeman (the poet) referred to the drive on the road through Barrow Gurney and Wraxall to Clevedon as one of the most beautiful in the country. It is to protect this beauty that the new power cables to cross this valley are to be buried at great expense. It is, therefore, extraordinary that anyone would suggest building on this land if there could possibly be land available elsewhere. The land is also part of the setting for the historically important ancient building of Birdcomb Court. I strongly object to any proposal to remove this beautiful and important countryside from the Wraxall Green Belt.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
R Smith	Walsingham Planning	<p>This section focuses on Chapter 2 of the Consultation Document. Overall, LVA consider that the need to build more homes should be identified as the key issue facing North Somerset. In addition, LVA consider that development North of Nailsea should be identified for consideration and that the Local Plan should be supported by a comprehensive Green Belt review.</p> <p>It is widely acknowledged across the political spectrum that the UK is in the grip of a housing crisis. Nationally, the average house now costs eight times the average income. Whilst the causes of the housing crisis are complex, at the most basic level, as a nation we have not been building enough homes.</p> <p>At a local level the rate of house building will have to increase substantially if North Somerset is to meet the housing target contained within the emerging JSP, let alone any higher figure that may result from the examination process. At present NS Council is unable to demonstrate a five year housing land supply against the currently adopted Core Strategy housing requirement.</p> <p>In light of this it is disappointing that the Consultation Document has not highlighted the need to build more homes as the key issue facing the whole of North Somerset that the Local Plan must address.</p> <p>The Consultation Document identifies seven broad locations within North Somerset as a starting point for identifying the main planning issues affecting different communities. As previously noted, LVA are the prospective developers of land to the North of Nailsea and therefore have an interest in the key issues facing Nailsea and Backwell.</p> <p>With reference to key issue 1, LVA support the identification of Nailsea in the emerging JSP as a location for strategic growth. Strategic growth at Nailsea is logical due to its relative sustainability and proximity to Bristol. LVA consider</p> <p>that all opportunities for growth should be fully considered including those within the Green Belt.</p> <p>LVA agree that the Local Plan should test the scale of development proposed and how it can be effectively assimilated into the communities of Nailsea and Backwell. However, LVA consider that as part of this the Local Plan should also test the location of development proposed.</p> <p>LVA support the identification of key issue 2 as they have serious concerns regarding the deliverability and impact of the proposed strategic road infrastructure as we will discuss further in following sections.</p> <p>LVA support the identification of the environmental implications of development on internationally protected habitats and floodplain areas as a key issue. In particular LVA have concerns that the environmental implications of the strategic road infrastructure have not been properly considered. The proposed Nailsea-M5 link road to the west of Nailsea passes through a number of important habitats.</p> <p>LVA welcome the recognition in key issue 7 that potential strategic growth at SW Nailsea is remote from the town centre. This is just one of the reasons that in LVA's view the justification for development at SW Nailsea is flawed and cannot be effectively assimilated into the existing community. LVA consider that the Land at North Nailsea is far better located in relation to existing services and facilities.</p> <p>In terms of how these and the other issues identified can be addressed through the Local Plan, LVA agree that the Local Plan should consider the opportunity for local Green Belt amendments. It should also identify potential allocations to address housing need and support local economic growth. However, LVA consider that given the scale of the opportunity presented by the Land at North Nailsea and the support of the Parish Council, it should be specifically identified as an option for further consideration.</p>	
Rocke Associates on behalf of Mactaggart and Mickel Homes Ltd	Rocke Associates	<p>A key issue for Nailsea, that is alluded to in Key Issue 5, relates to the lack of significant new housing development over a period extending to approximately 20 years. This is in large part due to reliance on a site allocation (at North West Nailsea) that has persistently failed to deliver housing, and notwithstanding its recent re-allocation in the Site Allocations Plan, there remains little evidence that it will deliver housing in the foreseeable future.</p>	

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		<p>The allocation of a substantial new growth area to the south-west of Nailsea is supported, both as an approach and in terms of location. Unlike other locations, growth to the south-west of the town is unconstrained by Green Belt, strategic gap, or other planning policy or environmental designations. However, there is a tension between a substantial strategic allocation and delivering housing in the short term to remedy the lack of new housing that has persisted for nearly two decades, and that is reflected in the declining and ageing profile of the town's population.</p> <p>If reliance is to be placed on a substantial strategic allocation to remedy the shortfalls of the past and stem the decline of the town, it is essential that housing delivery is facilitated at an early stage through the release of early phases of development. The delivery trajectory foreshadowed in the JSP evidence base (West of England JSP, SDL Templates p39 para 7.1) is wholly unsatisfactory since it indicates a further minimum period of 7 years before first housing delivery from the site. Given that the JSP Examination has now been delayed by a year compared with the situation prevailing when the trajectory was prepared, then the trajectory must be rolled forward by a further year meaning another 8 years before the site starts to deliver houses for occupation. Any further slippage will mean that this period increases still further.</p> <p>A key issue for the Plan is therefore how to bring forward early phases of the development that can deliver houses sooner than currently contemplated in the trajectory. A potential solution is available in the site north of Youngwood Lane that has already been subject to a planning application (16/P/1677/OT2) and in relation to which there is an identified masterplan solution for delivering development in accordance with garden community principles. The advantage of that site is that it incorporates the existing SAP allocation for 170 dwellings and which is intended to contribute to housing supply in the period to 2026, but which is subject to constraints on its development in isolation from the site for which application for outline planning permission was made. It will therefore facilitate the delivery of the allocated site intended to contribute to housing supply in the period to 2026, as well as early delivery from the wider strategic allocation which is intended to contribute housing in the plan period from 2016. It would compound the negative impacts of undersupply if another allocated site in a Development Plan document is unable to deliver housing at Nailsea within the plan period during which it is intended to accommodate needs.</p> <p>A key issue which is not currently reflected in the document is therefore the compelling and urgent need to deliver housing at Nailsea at an early stage in the plan period, which is already two years time-expired. This must be addressed through providing for early phases of development at Nailsea in advance of the wider strategic allocation.</p>	
S Ible	Terence ORourke	<p>The document identifies a number of key issues in respect of Nailsea and sets out how the local plan may be able to address these. Comments in respect of each of these is provided below:</p> <p>“Identifying the policies and allocations to guide the masterplanning and delivery of the strategic development locations, including new road corridors and public transport, housing, services, facilities and other infrastructure and phasing”</p> <p>The new local plan needs to provide site allocations, but its anticipated that the detail of masterplanning can be undertaken through an SPD and Gleeson are keen to input into this process.</p> <p>“Consider the opportunity for local Green Belt amendments”</p> <p>Gleeson does not consider it is justified for the Local Plan to make fundamental amendments to the Green Belt boundary and the exceptional circumstances required to amend the Green Belt are not demonstrated. Whilst it's understood Nailsea Town Council would support development to the north of Nailsea on land currently designated as Green Belt, the NPPF (2018) is clear in paragraph 136 that “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>preparation or updating of plans”. Paragraph 137 goes on to state “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate</p> <p>that it has examined fully all other reasonable options for meeting its identified need for development”. Clearly, land to the south and west of Nailsea is available to meet the identified need. This land is sustainably located, adjacent to the town and close to the railway station. It is available for development. There are no technical obstacles that would preclude development to the south of the town.</p> <p>No overriding harm would result in terms of, for example, landscape, heritage and ecology. There are no NPPF policies applicable to this land that protect the area and/or provide a strong reason to restrict development in this location. In conclusion, at this time, there is no justification for reviewing the Green Belt boundary to accommodate growth at Nailsea, including growth to meet the objectively assessed housing need.</p> <p>“Identify opportunities for public transport improvements, particularly the role of the station as a transport hub”</p> <p>Gleeson support the intension to identify opportunities for public transport improvements at Nailsea, particularly in respect of the opportunity for the station to form a transport hub. Gleeson control land directly adjoining the station car park and this land offers the potential to facilitate the ambitions of creating a transport hub. Alongside this it’s imperative that development is well located to the station, to facilitate walking and cycling connections to the station.</p> <p>“Reassess the policy approach to addressing local housing needs at Nailsea, and identify potential allocations”</p> <p>Clearly an approach to meet the local housing needs at Nailsea is required. However, whilst we note a potential to review the settlement hierarchy, Nailsea is clearly an important town where sustainable growth can be accommodated to help meet the wider needs of the district. This is reflected in the JSP. In this context, it is essential the plan doesn’t over-emphasise a strategy approach which seeks to meet local ‘Nailsea’ needs alone at the town.</p> <p>“Identify policies and allocations to support local economic growth, including new development areas and potential redevelopment opportunities”</p> <p>Gleeson support the local plan identifying policies and allocations to support local economic growth.</p>	
S Rees		<p>My concerns echo those of other local residents and are as follows:</p> <ol style="list-style-type: none"> 1. The Joint Spatial Plan (JSP) is still in a consultation phase. It is far too premature for NSC to propose how the draft JSP could be implemented in North Somerset. 2. The JSP/LP proposals for a Strategic Development Location of 700 houses at Grove Farm (an increase of approx 40% in the size of Backwell) would completely change the character of the village and result in a messy suburban sprawl with no proper identity. 3. The proposal for a new school near Grove Farm is not supported by any evidence from a coherent strategic plan for Backwell’s schools in the enlarged village. 4. The JSP & LP propose a new road across Backwell Common (Green Belt), creation of a ‘Transport Hub’ at the train station and ‘improvements’ at Backwell cross roads(!). The proposals for a large scale development at Grove Farm and a much larger one at Nailsea and elsewhere, will significantly increase the volumes of traffic through Backwell despite new roads being planned. The pressure on Backwell’s current roads will increase with the extra households. 5. There is a total lack of clarity on how these expensive infrastructure changes would be funded, especially as they would be needed before the housing development. 6. So far there has been no proper consideration of The Vale (near the South Bristol Link Road) as a suitable location for a large scale development. This site is much closer to far more employment and would thus minimise commuting traffic. A comprehensive Green Belt Review is required. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
SJH2017		We are concerned about the proposed development of green belt land north of Nailsea. We feel development to enhance Nailsea would be better focussed near the transport hub of the Station. Any development of the area to the north of Nailsea would appear to be detrimental to the environment, which is a flood plain area, and an undesirable addition to the gradual erosion of the green belt. The valley is a natural habitat for a wide range of flora and fauna, and is a valued green space essential to the character of the rural area.	
SR		We are opposed to developing on Green Belt land. This is a site of huge importance for nature, residents and future generations for this area. We fully support North Somerset Council's policy to maintain the Green Belt north of Nailsea.	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	<p>TW welcome the preparation of the NLP and broadly agree with the main issues presented in the Issues and Options document and the identification of Land at Grove Farm, land at Burnt House Farm and Rodney Road as the Backwell SDL. However, discussed below are those elements of the NLPIO that TW wish to provide comment on.</p> <p>TW are broadly in agreement with the issues and challenges identified in the NLPIO with regard to the Backwell SDL. We would note that consideration will be given to local Green Belt amendments in the NLP. The existing Green Belt designation comes up to the South side of Chelvey Lane and the access to the Backwell SDL from the A370 goes through the Green Belt and could be considered for a local Green Belt amendment to form a more permanent boundary, in line with NPPF para 136 that states "having regard to their intended permanence in the long term, so they can endure beyond the plan period.....".</p>	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	<p>Q3. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?</p> <p>2.2 TW are in general agreement with the issues and challenges identified in the NLPIO with regards to the potential development of Rodney Road and the wider SDL.</p>	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	<p>Q3. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?</p> <p>2.2 TW are broadly in agreement with the issues and challenges identified in the NLPIO with regard to the Backwell SDL. We would note that consideration will be given to local Green Belt amendments in the NLP. The existing Green Belt designation comes up to the South</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>side of Chelvey Lane and the access to the Backwell SDL from the A370 goes through the Green Belt and could be considered for a local Green Belt amendment to form a more permanent boundary, in line with NPPF para 136 that states “<i>having regard to their intended permanence in the long term, so they can endure beyond the plan period.....</i>”.</p>	
The Baker Family		In reality this question is the introduction to section 4 and in particular the comments under point 4.4 Nailsea. As such our clients are in broad agreement.	
The Belmont Estate	Ridge and Partner LLP	<p>These representations have been prepared by the Belmont Estate in relation to the North Somerset Local Plan 2036 Issues and Options Consultation with input from Ridge and Partners.</p> <p>The Belmont Estate consists of a significant landholding of approximately 242 acres. It is situated in Wraxall, approximately 1.3 miles north of Flax Bourton and 3.8 miles east of Nailsea. It is located adjacent to the Tyntesfield Estate and forms part of the Registered Park and Garden of Tyntesfield. The Estate has a lengthy and interesting history. It comprises a Grade II* Historic Park and Garden, registered as such for its special historic interest, a Grade II listed country house of late 18th Century origin, a Grade II Listed Carriage House (previously Laundry Cottages) and adjoining Grade II listed Kitchen Walled Garden together with Grade II listed Clifton Lodge, Station Lodge and Belmont Lodge (this last owned separately from the Estate). In addition there is an independently Grade II* listed tree lined avenue, once the principal entrance to Tyntesfield. The estate’s ½ mile southern boundary with the Clevedon Road forms part of what is reputed to be the longest holly hedge in the country (also noted within the overall listing).</p> <p>As this representation highlights, the Estate is therefore an important heritage asset in the North Somerset area and should be recognised as such in the emerging Local Plan and its evidence base.</p> <p>The Issues and Options Paper poses a series of questions and this representation aims to specifically answer the relevant questions highlighted within the paper. Essentially, this representation seeks to ensure that a robust and flexible Local Plan is prepared which takes into account the important Heritage Assets of the Estate and the need for these Assets to be protected and enhanced but also sustained for future generations in accordance with the National Planning Policy Framework (NPPF).</p> <p><u>Estate Background</u></p> <p>The Estate’s landholding extends to approximately 242 acres. It is situated in Wraxall, approximately 1.3 miles north of Flax Bourton and 3.8 miles east of Nailsea. It is located in an elevated position on the hillside above the Bristol Road and can also be accessed from Belmont Hill. A site location plan accompanies this representation.</p> <p>The Estate has a lengthy and interesting history. For many years it formed part of the adjacent Tyntesfield Estate, now owned by the National Trust. In 1760 William Turner bought Belmont House as a cottage. Following his death in 1804, the Estate was left to his nephew George Penrose Seymour who also bought Tyntes Place; the site on which Tyntesfield was later to be built.</p>	<p>Belmont Estate Boundary.pdf (1.1 MB) Belmont Estate - heritage assets (002).JPG (76 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>In 1870 George's cousin William Gibbs bought Belmont, reuniting it with Tyntesfield. For several generations thereafter, the Belmont Estate passed through the hands of the Gibbs family until 2001 when Richard, 2nd Baron Wraxall, died and Tyntesfield was sold to the National Trust. At this point, Belmont briefly became an independent estate before being broken up and then, remarkably, within the same decade, reassembled by the current owners, a family that has been part of Bristol life for the last 175+ years.</p> <p>As previously highlighted, the Estate forms a Grade II* Historic Park and Garden, registered as such for its special historic. In addition, it also comprises a number of other important designated heritage assets including:</p> <ul style="list-style-type: none"> ? Grade II listed Belmont House, of late 18th Century origin (List UID: 1129055) ? Grade II Listed Carriage House (previously Laundry Cottages) and adjoining Kitchen Walled Garden (List UID: 1061348) ? Grade II listed Clifton Lodge, with gates and gate piers to the south-east (List UID :1061339) ? Grade II listed Station Lodge, including gate piers and gate adjoining north west (List UID: 1061349) ? Grade II Listed monument to Joseph Farrell, in the grounds of and to the south east of Belmont House (List UID: 1320987) ? Grade II listed Belmont Lodge - this last owned separately from the Estate (List UID: 1061335) <p>The above designations are shown on the Historic England map enclosed. That map also demonstrates that the Estate is surrounded by numerous other designated heritage assets, including those of the neighbouring Tyntesfield Estate. The Estate is therefore an important heritage asset in the North Somerset area and this should be taken into account when considering proposals for new development and infrastructure in North Somerset.</p> <p>The Tyntesfield Estate, owned by the National Trust, is situated directly to the north west of the Belmont Estate and houses a Grade I Listed Building, numerous other Grade II Listed buildings and monuments as well as also forming a Grade II Listed registered Historic Park and Garden. Formerly, the two Estates formed one.</p> <p>Directly to the east lies the Ashton Hill Plantation which is a 148 acre forestry commission woodland and local nature reserve that also previously formed part of the Tyntesfield Estate. To the south is an area of around 130 acres of Grade 1 agricultural land owned by the North Somerset Agricultural Society. Until 2002 this also formed part of the Tyntesfield Estate and houses Grade II listed Victorian Bathing ponds.</p> <p>In addition, there is an independently Grade II* listed tree lined avenue at the Estate, once the principal entrance to Tyntesfield. The Estate's ½ mile southern boundary with the Clevedon Road forms part of what is reputed to be the longest holly hedge in the country (also noted within the overall listing).</p> <p>The Estate is also situated within the Bristol and Bath Green Belt. The Joint Spatial Plan Green Belt Assessment (November 2015) highlights at p.54 that this part of the Green Belt (cell name 71) serves purposes 2, 3 and 5 of the Green Belt including:</p> <ul style="list-style-type: none"> ? Helps prevent the merger of Nailsea, Long Ashton and Bristol ? This land safeguards the countryside from encroachment. There is also significant recreational and agricultural use. ? The Green Belt assists in preserving the setting of Tyntesfield House and the country estate. <p>It goes on to state that this area forms part of the steep sided ridge in the vicinity of Wraxall and Failand and includes the Tyntesfield estate (National Trust). The area is primarily open and undeveloped, with heavily wooded areas, agricultural land and open recreation uses.</p> <p>It is important to note that the Belmont Estate is privately owned and is actively involved in laying the foundations of a self-sustaining modern estate that is home to an agricultural and forestry business with an ethos to restore heritage value. Following the reassembly of the Estate, starting with the land in 2012, the regeneration and maintenance of the ancient woodland has been achieved, allowing active farming to have begun on the Estate's pasture land. As well as reassembling the fragmented land and buildings of the estate the owners have invested (and continue to invest) very heavily in restoring the listed buildings, gardens and grounds as well as committing ongoing significant sums to develop a training, education, hospitality and tourism enterprise. This representation therefore seeks to ensure that the Estate is able to maintain the viability and maintenance of the numerous heritage assets that form part of the Estate for future</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>generations.</p> <p><u>Question 3 – Nailsea and Backwell challenges and issues</u></p> <p>The Estate has previously highlighted its concerns regarding new strategic development at Nailsea and Backwell in its representations to the JSP given the reliance upon the delivery of significant new highways infrastructure to deliver these developments which will evidently result in significant environmental harm, including harm to designated heritage assets. For this reason, it is considered that development in these locations is unsustainable and this must also be considered in tandem with the fact that the locations for development in these areas is far from significant employment opportunities and in an area that will further encourage travel by car rather than more sustainable travel modes. In so doing it will place further burden and create further noise and pollution on existing highways while also being heavily reliant on the construction of significant new highway infrastructure.</p> <p>With regard to Key Issue 1, we also express our concern that progress with the Local Plan at this point is premature given that the JSP has not yet progressed to examination hearings and the Inspector has yet to provide comment on the Spatial Strategy proposed by the JSP. Our previous representations to the JSP and initial Local Plan consultation have highlighted concerns regarding the strategy to include strategic development locations at Nailsea and Backwell due to significant environmental constraints that will arise as a result of the infrastructure proposals that are needed to support development in these locations. As above, it is the Estates position that the proposals are not only unsustainable due to their location far from significant employment opportunities but will also further encourage travel by car, with all the attendant problems of noise and other pollution to the environment. Furthermore, it will result in the need for significant new infrastructure to mitigate the impacts of new development which will have a harmful effect on the natural and historic environment. These issues have also been raised by numerous consultees such as Historic England and it is clear that the Inspectors would like to understand further details at the examination regarding the Spatial Strategy and strategic development locations.</p> <p>Key issue 3 acknowledges one of the important issues to be “The environmental implications of development on internationally protected habitats and floodplain areas.” The Estate is in agreement with this point to some extent. However, we suggest this needs to go further as it has not included the importance of ensuring that designated heritage assets (such as those at the Belmont Estate) are protected and enhanced in line with the NPPF. This is a significant point that needs to be referenced and fully considered in the Local Plan. We also note that in Historic England’s latest response to the JSP earlier this year it was highlighted that more clarity is required to demonstrate the evidence that has been gathered and applied to inform the impact of the proposed extension to Nailsea on the setting of numerous highly graded Heritage Assets and the wider landscape as a whole.</p> <p>Key issue 4 relates to the proposed strategic road infrastructure to support development at Nailsea and Backwell. In this regard, the Estate would like to highlight that as part of the consultation to the JSP earlier this year, Historic England highlighted the importance of undertaking further work to clarify the route of the link road between the A370 and Nailsea as well as its form and scale to help appreciate the impact on the historic landscape and the setting of Heritage Assets likely to be affected. The potential for impacts as a result of a new M5 Junction to serve a new road from Nailsea on significant Heritage Assets also needs to be carefully considered. We fully support the concerns raised by Historic England in this regard and urge the Councils to undertake further work to analyse the potential for significant impacts on the nearby heritage assets, including those at the Belmont Estate and neighbouring Tyntesfield Estate. We are also concerned regarding any proposals that place further traffic burden onto the B3130 and particularly any proposed link Road from B3130 Clevedon to B3130 Bristol which could have a significant and material detrimental impact on the Registered Park and Gardens of Tyntesfield and Belmont and needs to be carefully assessed.</p> <p>Key issue 8 refers to the need to encourage a range of local employment opportunities including start-ups and small businesses. Key Issue 9 relates to the need to improve opportunities for sport, leisure, community and cultural activities and events. These issues relate strongly to the Estate’s key priorities. The Estate’s focus is to ensure its heritage assets are maintained and enhanced for future generations to enjoy. To do this, the Estate has sought to reassemble and revive Belmont into a modern, working estate that can be shared with others and can generate its own income to ensure its viability. The Estate seeks to open its doors to the public through activities such as countryside and environment classes, butchery and cookery classes, mindfulness and yoga as well as possibly an occasional private function hire. The Estate employs a number of staff already and would like to expand upon this where possible through new business avenues at the Estate.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The Estate therefore fully supports keys issues 8 and 9. It is considered important that the Plan helps, rather than hinders small local businesses and rural employment opportunities and provides access to community and cultural events. However, the Estate suggests the Local Plan needs to take a more flexible approach to proposals to enhance Estates such as Belmont, which can provide good local employment opportunities and important tourist attractions that also help the Estate thrive and grow to enable the preservation and enhancement of its heritage assets for future generations. We would like to see this reflected in planning policy regarding rural tourism and business as highlighted later in this letter.</p>	
WENP	West of Engln Nature Partnership	<p>We note the recognised issues, in particular the impact of the proposed strategic road infrastructure and the environmental implications of development on internationally-protected habitats and floodplain areas, but are concerned that no further comment is made as to how the Plan could address these. We are particularly concerned about the environmental implications of the abovementioned road infrastructure and would welcome this explicit link, for example:</p> <p>3. The environmental implications of development and associated infrastructure (including roads) on internationally protected habitats and floodplain areas.</p> <p>We welcome the development of a Town Vision to enable residents to help shape the Local Plan.</p>	
Wessex Water (Ruth Hall)	Wessex Water	<p>Significant investment will be required into the sewerage systems in Nailsea and Backwell to accommodate the levels of development proposed. Key issue number 3 “The environmental implications of development on internationally protected habitats and floodplain areas” does not appear to be addressed in the corresponding “How can these issues be addressed through the Local Plan?”</p> <p>We are concerned about the potential impacts arising from proposed development and road infrastructure on our landholding at Backwell Lake. The lake acts both as a balancing pond for surface water from a large area of Nailsea and is a wildlife site of local importance, hosting populations of legally protected species. The Local Plan needs to make detailed considerations of the impact from the proposals on bird and bat populations and enjoyment of the site by recreational visitors.</p> <p>Wessex Water, through the Water Industry National Environment Plan (WINEP), investigated the impact of a surface water run off into the Tickenham, Nailsea and Kenn Moor Site of Special Scientific Interest (SSSI). The study recognised that improvements will be required to mitigate the impact of flows and composition of run off from 70% of Nailsea’s impervious areas.</p> <p>The WINEP requires Wessex Water to contribute towards a partnership project to deliver improvements to the quality of the surface water outfall to the SSSI. We suggest that support of a partnership project can be facilitated and supported through the Local Plan. We consider that the Local Plan needs to fully engage with the North Somerset Levels and Moors Partnership project to evaluate opportunities to effectively address the implications of the development proposals on the environment. This project has been identified as a priority by the Bristol Avon Catchment Partnership and is supported by the Environment Agency, North Somerset Council, Natural England and the Internal Drainage Board. Wessex Water is also fully supportive of the work and have committed funding since 2015 to help drive progress. We therefore consider that the North Somerset Levels and Moors Partnership is well placed to help coordinate and deliver environmental improvements which will address or mitigate some of the expected impacts arising from the planned development.</p>	
Weston Town Council	Weston-super-Mare Town Council	<p>While Weston is willing to take its fair share of development the towns of Portishead Nailsea and Clevedon and large villages must also be required to take their fair share including adjusting the green belt boundary if necessary.</p>	
Wraxall	Mrs	<p>I agree with North Somerset's view that land should not be released from Green Belt unless exceptional circumstances exist. I object most strongly to Nailsea Town Council's suggestions that land to the north/north east of Nailsea be released from Green Belt in order to build houses/roads/increased trading estate</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>facilities. On so many levels this seems nonsensical and I am pleased North Somerset has chosen not to consider this land for development. Our green belt area is of significant value on so many levels. Green Belt exists to stop the very sprawl that Nailsea Town Council is proposing - its value on a social and environment level is significant, and local residents feel most strongly that this special valley must be protected. I have seen flooding on a considerable level over the years, and it would seem madness to build on an area where the river is prone to overflowing. Any development would surely impact on the water course. Given the flooding we have experienced in Somerset over recent years, this must surely be an unwise choice for development. Our green belt allocation protects against this. The valley northeast of Nailsea is a significant wildlife corridor, including as it does low-lying wetland areas, and links up with the areas of SSSI towards Twickenham it must be protected. It is a site of considerable local heritage, with an important grade 2* listed building at one end and a history of significant archaeological finds. Nailsea Town Council's idea that there can be some sort of 'swap' of green belt between North East Nailsea (the valley is actually in Wraxall anyway) and Backwell does not hold water. There can be no 'swapping' arrangement - each has to be dealt with on its own merits and independently. Please do not consider interfering with the Green Belt north of Nailsea. Even a small amount of development would spoil this special valley forever. Surely we should be ensuring the protection of our valley for future generations. There are far better options available for development</p>	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	<p>It is considered that the published feedback from the Nailsea Urban Extension Workshop held on 20 November 2018 reflected differing views on the challenges and issues.</p> <p>The Strategic Development Location to the south west of Nailsea (SDL-N) can be considered to be a 'dormitory' development resulting in increased commuting to Bristol. New transport corridors (roads and MetroBus links) are proposed to take the additional commuter traffic, feeding into the Cumberland Basin road network that is already at capacity. The West of England Joint Spatial Plan (JSP) does not propose improvements to this critical river crossing. A development within the SDL-N will result in commuters adding congestion to the rural road network. A sustainable and deliverable transport infrastructure solution has not been proposed. W&FPC considers this to be fundamentally the wrong approach.</p> <p>Homes should be built close to the areas of significant employment and transport infrastructure. The proposal for housing inside the South Bristol Link (SBL) is considerably more sustainable than the developments proposed by the JSP, as the basis for road, cycling and MetroBus networks is already in place.</p> <p>Nailsea Town Council's (NTC) Vision, as an alternative to the SDL-N, to expand radially and construct a link road on the land to the north and east of Nailsea in Valley of the Land Yeo (VLY) is strongly opposed by W&F PC. Development and new roads in this area are significantly constrained by flood zones and surface water and will have a detrimental impact on ecology, wildlife and archaeology. W&F PC's views on local Green Belt amendments are addressed under the response to Q5.</p>	
Wrighton Parish Council	Wrighton Parish Council	<p>Both Clevedon and Nailsea are to consider "the opportunity for Green Belt amendments". However NSC's policies aver protection for the existing Green Belt (which is highly valued by residents.). NSC has declined to consider sacrificing Green Belt between the southern ring road and Bristol City (Ashton Vale) on the basis of their current policy to protect Green Belt. The two appear to be contradictory.</p>	

Document Part Name

Q4. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?

Respondent Name	Respondent Organisation	Comment	Attached documents
Abbots Leigh Parish Council		<p>The A369 is at full capacity at peak times and carries heavy traffic throughout the day through the Neighbourhood Plan Area. Residential and/or employment growth generated around Portishead and/or to meet the needs of Royal Portbury Dock are likely to increase traffic, some of which would filter onto the A 369. We are concerned</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		about the impact of expansion at Portishead and welcome measures to reduce traffic congestion on routes to Bristol, improve accessibility to the M5 and Bristol through highway and public transport improvements and deliver the Portishead rail line.	
Alex Child	The Planning Bureau Ltd	The housing needs for older people in the town should be specifically assessed and if necessary, policy formulation for Portishead should include provisions that specifically encourage the provision of retirement housing for older people	
Aston	Aston and Co UK	<p>Key Issues Point 1-5 – agreed. Points to address through the Local Plan must also include provision of additional residential land use and Live-Work units.</p> <p>Further development at Portishead (a larger town under Policy CS14: Distribution of new housing in the extant Core Strategy) coupled (where appropriate and relevant) with investment in necessary infrastructure and community facility upgrades is sensible rather than the establishment of garden villages. The key issues to address are:</p> <ul style="list-style-type: none"> • The regeneration around the industrial docklands (east) is complete but there remains scope for release of land from GB to the south west at Black Rock, adjacent to the settlement boundary and within the largely level walk of the established service centre. This is historically the western industrial edge of Portishead (see Appendix A, Cultural and Heritage Report) and importantly lies outside of the flood risk constraint. It has already been urbanised with pavements and street lighting running the full length of the site frontage connecting it to the centre of • The whole of Portishead is constrained by the historic Green Belt but the extant Core Strategy provides flexibility for appropriate additional development at the settlement boundaries (Policy CS31). This flexibility was introduced under examination by the Examining Inspector to make the plan sound (Inspectors Report, Policy MM04). We agree with the proposal to “<i>Examine the potential for allocating additional employment land, possibly through small-scale Green Belt releases</i>” but such localised Green Belt review must more widely include consideration of all future land use development options to accord with forward plan making <ul style="list-style-type: none"> ◦ The detailed report in Appendix A sets out the history, purpose and amendments made to the Bristol & Bath Green Belt (GB) since its introduction. Through this forward plan process it is essential for the GB to be reviewed. Small scale changes such as implemented east of Keynsham, to release GB land for housing and thereby protect the UNESCO World Heritage City of Bath, illustrate the need and benefits of following central government plan making guidance (see Appendix A – Green Belt Report). <ul style="list-style-type: none"> ▪ Flood remains a key constraint at Portishead and effective and appropriate land use allocations cannot be made until North Somerset Council’s outdated Strategic Flood Risk Assessments are updated to inform robust decision making. The United Nations Intergovernmental Panel on Climate Change (IPCC) October 2018 updated climate forecast has re-emphasises a crucial requirement in plan making. It is an essential requirement that forward plans avoid areas at risk of flood (whether defended or not) to ensure futureproof sustainable ▪ No land should be allocated for housing development in areas at risk of flood as that cannot be sensible or Sustainability is the central tenant of effective plan making. There remain open questions over the maintenance and integrity of the existing flood defences at Portishead (See Appendix A - Flood Risk Report). <ul style="list-style-type: none"> ▪ Transport and infrastructure investment is already underway to benefit Portishead including: <ul style="list-style-type: none"> ▪ M5 Junction 19 roundabout and A369 (Portbury Hundred) to remove summer tailbacks (see here) ▪ Metro West’s project to reopen the Portishead to Bristol branch line is due to be examined by the Planning Inspectorate in May/June 2019 and will upon consent be implemented to improve access between the two locations. ▪ A cycleway/greenway is planned along the B3124 between Portishead and Bristol that will improve sustainable transport links. ▪ Each of the above measures will improve the ability of this established larger settlement to accommodate much needed housing. The Replacement Local Plan should include a specific policy to encourage sustainable Live-Work units that can 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>provide new flexible accommodation and local employment without increasing outward commuting pressures. Such space also removes associated commuting costs and can benefit from small business rates relief (non-residential element), assisting with the issue of affordability, encouraging local business start-up and supporting rural vitality.</p> <ul style="list-style-type: none"> ▪ Sites such as the land at Black Rock (Site reference HE18124) are within a sustainable location on the edge of a larger settlement, outside of the flood risk area and utility/service capacity has been verified with the relevant statutory undertakers. Such land could therefore swiftly bring forward beneficial housing including 35% compliant affordable and Live-Work units for local young people. There is far greater certainty of viability and delivery timing than a garden village scenario. ▪ The Royal Portbury Dock has been expanding since its creation with additional parking/car storage land having been recently created close to the M5. The existing separation of this complex from the north eastern edge of Portishead is approximately 750m-1,000m. The primary purpose of the Bristol and West Green Belt was to separate and contain Bristol. If this gap is any further reduced or visually affected then Portishead will effectively be joined with the Portbury Dock and thereafter Avonmouth, Shirehampton and the outer Bristol urban areas. That would adversely impact primary Purpose 1 of the Green Belt. Great care must therefore be exercised in containing any further encroachment of Portishead to the south east towards Junction 19 or the Royal Portbury Dock west towards Portishead. 	
Avon Wildlife Trust	Avon Wildlife Trust	The recent growth within Portishead has put increasing pressure on the semi-natural green space within this area. There are a number of nationally important nature reserves and statutory designated sites in close proximity to Portishead. Any further growth, through brownfield development or greenbelt releases, must take account of the increased recreation pressures on these valuable ecological resources.	
B Bateman	Firstplan	Waitrose has an existing foodstore in Harbour Road, Portishead which plays an important role in supporting the health of the town centre. Ensuring the long term vitality of Portishead town centre by providing a positive strategy for its future should be one of the key issues for the new Local Plan. Under the current Local Plan, the Waitrose store falls within the defined town centre boundary but the site is not designated as part of the defined Primary Shopping Area. The adjoining Old Mill Road site is allocated for redevelopment in the adopted Local Plan and there is an outline planning application currently pending determination for redevelopment of the site to provide a mix of town centre uses. The new Local Plan and Town Vision provide an opportunity to review the role and focus of the town centre and the Primary Shopping Area in light of proposals on the Old Mill Road site and other more general changes in the retail and leisure sectors, to ensure that Portishead town centre benefits from a positive, flexible approach to its future management and protection. The role of the Waitrose store as an important anchor to the town centre should be recognised in any future town centre strategy.	
Cleeve Parish Council	Cleeve Parish Council	<p>CPC agree with the issues identified. CPC believe that the Portishead rail connections should be delivered before any further infrastructure improvements commence.</p> <p>Existing employment land should not be used for residential development, if further industrial development means taking land out of the Green Belt.</p>	
CPRE Avonside	CPRE Avonside, North Somerset District	<p>Portishead has motorway connections which although not 'sustainable' provide routes north/south. Portishead has had considerable development but is yet to see the delivery of the Portishead rail line to Bristol and beyond.</p> <p>Frequent congestion on the M5 and to Bristol emphasises the importance of having sustainable modes of transport in place before development. Safeguarding and delivering the rail route should have been an imperative.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		We would expect the new 'Visions' being prepared would respect the landscape and work to enhance the setting of the towns.	
E Wade		<p>1 Residential Mix - Portishead has absorbed large areas, ranges and types of new housing over the last few years. The substantially expanded urban area now needs a period of time to consolidate and integrate into the community before any further development is planned.</p> <p>2 Transport - the re-establishment of the rail link would benefit residents, commuters, visitors (all travellers) and could limit and/or reduce pollution from any increased use of road vehicles also, thereby, avoiding the need for anything but minor highway improvements.</p> <p>3 Employment Land - thought must be given to employment provision but nibbling away at the Green Belt should be done with great caution. As part of the West of England Spatial Plan consideration is being given to devising and delivering a Green Infrastructure Plan, perhaps the outcome of this should be awaited.</p> <p>4 Environment Protection - Portishead values all its recreational open spaces, woodlands, playing fields, nature reserves and wildlife sites, SSSI's and RIGS, open vistas and viewing points alongside the estuary, footpaths and the coastal path. These should be protected for their importance and benefits to people, as well as areas which limit any adverse impact on wildlife, and as such should avoid being put under pressure of development. The Landscape and Visual Impact Assessment document went some way towards this. Once these area are lost they can never be retrieved.</p>	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	The A369 is at full capacity at peak times and carries heavy traffic throughout the day through the Neighbourhood Plan Area. Residential and/or employment growth generated around Portishead and/or to meet the needs of Royal Portbury Dock are likely to increase traffic, some of which would filter onto the A 369. We are concerned about the impact of expansion at Portishead and welcome measures to reduce traffic congestion on routes to Bristol, improve accessibility to the M5 and Bristol through highway and public transport improvements and deliver the Portishead rail line.	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	<p>The two Parish Councils are engaged in preparation of a joint Neighbourhood Plan with the Neighbourhood Plan Area (NPA) covering the two parishes including parts of Royal Portbury Dock. There is also a Community Land Trust (Pill and District Community Land Trust) aiming to provide affordable housing for local people within the area.</p> <p>2.4 Portishead</p> <p>The A369 is at full capacity at peak times and carries heavy traffic throughout the day through the Neighbourhood Plan Area. Residential and/or employment growth generated around Portishead and/or to meet the needs of Royal Portbury Dock are likely to increase traffic, some of which would filter onto the A 369. We are concerned about the impact of expansion at Portishead and welcome measures to reduce traffic congestion on routes to Bristol, improve accessibility to the M5 and Bristol through highway and public transport improvements and deliver the Portishead rail line.</p>	
Ecomotive Ltd		The Local Plan could address the identified issues, particularly those listed in the table below, through allocating specific sites, or minimum areas within larger development sites, specifically for CLH and/or self build. (see table in attached document)	North Somerset Local Plan - submission by Community Led Housing West December 2018.pdf (171 KB)
First Step Homes	First Step Homes (Wessex) Ltd	We support the opportunities for amendments to the Green Belt around these well-connected and serviced settlements	

Respondent Name	Respondent Organisation	Comment	Attached documents
Flax Bourton Parish Council	Flax Bourton PC	<ul style="list-style-type: none"> The improvement to the Sheepway and the well-researched Portishead rail connection has been postponed on more than one occasion but is readily achievable and would open up alternative development opportunities. It is deliverable at a fraction of the cost of the proposed road infrastructure required for the proposed Strategic Development Locations. This is evidence of North Somerset Council's failure to secure vital infrastructure before allowing housing development. 	
Geoff Fox		<p>Creating and protecting a vibrant High Street in Portishead is a critical issue that should be treated as a priority.</p> <p>Transport is recognised as a major constraint on the town. Real solutions need to be found quickly.</p> <p>Affordable housing is another high priority.</p>	
Gladman Developments Ltd	Gladman Developments	<p>4.3.1 Gladman are supportive of the issues identified by the Council to be addressed in the town of Portishead. Gladman have previously delivered employment land in the town to the south of Bristol Road (A370) which is currently almost fully occupied by a number of significant employers.</p> <p>4.3.2 Gladman control land to the south of the existing business park which is considered appropriate as an extension to the existing park thus providing significant new employment land in Portishead. We acknowledge that this land is designated as Green Belt, however the Council acknowledge through the consultation that Portishead is tightly constrained by the Green Belt and small scale Green Belt release may be necessary to ensure a continuous supply of employment land in the settlement across the plan period.</p> <p>4.3.3 Gladman consider that an extension to the existing successful employment provision in this location would have a limited impact on the Green Belt with the site being well screened from the wider surrounding countryside and when considered against the five purposes of including land in the Green Belt. With the town being so tightly constrained by the Green Belt, it is inevitable that if additional employment land is required then Green Belt release will be needed. The provision of new employment in this location could take advantage of the existing infrastructure in the area, is well located for access to the national highway network and is in an area that is in demand from employers seeking to be located close to Bristol.</p> <p>4.3.4 Gladman have a significant track record in delivering employment land across the country over the past 30 years and are keen to work alongside the Council to realise the Council's ambitions of providing additional employment land in Portishead through the Local Plan.</p>	
Heather Toms		<p>Small-scale green belt releases for any development is the thin end of the wedge. Once you allow it, where will it end. Our wildlife's natural habitats in Portishead has vastly decreased as it is, without any further disruption.</p>	
Ian	Mr	<p>Residential development should only be carried out after the improvements to transport infrastructure have been completed, and then only if it can be proved that Portishead schools, medical facilities and other public amenities are able to cope with the increased number of residents, especially children.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>There is no shortage of "market value" housing in the time, so any house-building should be 100% affordable, or at least 90%, otherwise the only people benefiting are developers and property investors.</p> <p>Releases of Green Belt land may only be initially "small-scale", but this could open the flood gates to applications for additional releases.</p> <p>The needs of Portishead residents must be given priority to the wishes of Royal Portbury Dock.</p>	
Julia Hawkins		<p>Although I agree with 'Examine the potential for allocating additional employment land' I must object to 'possibly through small-scale Green Belt releases'. Once the Green Belt is compromised it is all too easy to release further pieces of land and eventually we will have no Green Belt left.</p>	
Lands Improvement		<p>As with Weston-super-Mare, we believe that there is scope to deliver additional housing at Portishead on previously developed sites rather than on greenfield sites around the town. However, we would support small scale Green Belt releases to accommodate some development where the Green Belt is considered to make only a limited contribution to the purposes of its original designation and sustainably located.</p> <p>3.8 We also strongly support the re-opening of the train station at Portishead as this would significantly improve the sustainability credentials of the town more generally, but also facilitate the re-opening of other stations on the line to Bristol, namely at Pill/Easton-in-Gordano.</p>	
Libbyrich		<p>Portishead needs more small scale housing development to accommodate local need. This could be assisted by the release of small pieces of land as long as they are not in the flood plain or area of wildlife importance.</p>	
Long Ashton Parish Council	Long Ashton Parish Council	<p>Broadly agree, but with reservations about the need for amending the green belt and overall scale (as in Q1). Re-opening of the railway to Portishead should be a priority before further expansion takes place.</p>	
N Cooper	Claverham Future	<p>The only sensible thing here is the needs of Portbury dock, it is a real employer. The unfortunate thing is that the affordability of housing is a major issue. Has the average wage at the dock been looked at in terms of what can be mortgaged on new developments? If not then there is a fatal flaw. Traffic congestion is all to do with who can afford the housing, North Somerset has failed if it cannot square this circle. NSC either build Council housing or they move all developments close to the higher paying employment centres and require purchasers of new stock to be close to the actual areas of employment. NSC failed to join with other counties and its attempt to control housing closer to WSM is a bust flush, it will not result in more commercial income. (unless they build cheap accommodation to bump start that economy).</p>	
Natural England	Natural England	<p>We note the references to future land use needs of Royal Portbury Dock. While there is little detail available at this stage, when considering development in this location it will be important to ensure potential effects on the adjacent Severn Estuary European site are understood and can be addressed.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>It is inappropriate to start with a premise that there is little scope for further growth due to the town being tightly constrained by Green Belt. There were over 7,000 homes built in Portishead between 2003 and 2012 many provided by Persimmon Homes and Charles Church. Even though this included a number of new flats, 68% of the total housing stock in Portishead remains family homes of three or more bedrooms. Families living in Port Marine and The Ashlands tend to be younger than average. There is also a substantial number of children and young people living there.</p>	<p>📄 Location Plan_A4_C.PDF (699 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>For example, in the Wards covered by Port Marine and The Ashlands, on average about 30% of the population is aged 0-15 compared with an average in North Somerset of 18%. A large proportion of these people will grow up in the town and will require housing in the future.</p> <p>The most sustainable solution is to give them the opportunity to do that which will help retain employment in the town and support and benefit from the delivery of the railway line and new station. We note the intention is to consider residential development opportunities 'particularly on previously developed land'. This will inevitably lead to the continuing loss of existing employment sites in Portishead, conflict with the issue to ensure retention of sufficient employment opportunities with the town, adding unnecessarily to the need to 'investigate opportunities for allocating land for employment on the edge of Portishead.' However, given that there is an expectation that opportunities exist for employment land on the edge of Portishead, the principle of also investigating the opportunity for residential development also exists.</p> <p>This suggests a sustainable mixed use extension to Portishead, which would include homes, jobs, open space, a primary school and a local centre and support for rail and highway improvements should also be tested. The opportunity for this exists on land south east of Portishead controlled by Persimmon Homes Severn Valley to achieve this. In addition this land also provides the opportunity to accommodate a new station and car park as a far more cost effective developer and landowner supported solution than the much delayed MetroWest proposal should this prove to be unviable and ultimately undeliverable.</p> <p>Notwithstanding that this is not considered, there is an inconsistency in the way Green Belt issues are addressed in the Issues and Options document, where at Clevedon there is the opportunity to consider small scale Green Belt amendments for residential development, but at Portishead, small scale Green Belt releases are limited to allocations for additional employment land.</p> <p>SITE PLAN OF LAND OWNERSHIP EXTENT AT PORTISHEAD ATTACHED.</p>	
Portishead Town Council	Portishead Town Council	<p>Agree with the 5 key issues:</p> <ol style="list-style-type: none"> 1. To ensure the retention of sufficient local employment opportunities within the town. 2. To improve the accessibility to the M5 and Bristol through highway and public transport improvements 3. To support public transport access to Bristol through the delivery of the Portishead rail line and other public transport improvements 4. To identify opportunities for residential development, particularly on brownfield sites 5. Investigate opportunities for allocating land for employment on the edge of Portishead 	
Stokes Morgan Planning Ltd	Stokes Morgan Planning Ltd	<p>We support the aim to identify more opportunities for residential development. Whilst the principle of additional employment land on the edge of Portishead (through the small-scale release of Green Belt land) is welcomed, the reality is that much of the Green Belt surrounding Portishead is in the Flood Zone, or is SSSI or SNCI land (blue, red and orange on the map below, respectively).</p> <p>In this context, it is clear that there are limited areas where green belt land could be released. It is also the case that the town has been substantially developed over the last fifteen-twenty years, and that brownfield land within the town is limited. If additional housing is to be built in Portishead, it will require the releasing of green belt land, and there is the potential for these two aims to be incompatible with each other.</p> <p>In this context, SHLAA site HE18133 (show as red star on map above; see following site plan and details) is one such site that sits on the fringe of the existing built development and has the potential to deliver additional growth within the Plan period without the precursor of significant additional infrastructure requirements. If Green Belt land is to be released around the edge of Portishead, locations such as this would be better suited to meeting the housing need.</p> <p>This site in particular would be ill-suited for employment land, given the surrounding nature constraints, whereas a housing scheme would be better able to provide the appropriate site mitigation. In terms of access, the local roads would be less well-suited to commuter traffic, whereas in terms of housing, the land is more demonstrably sustainable given its proximity to schools, and the services and facilities in Portishead town centre. Employment uses would be better-suited to central Portishead where</p>	<p>E81207_NSC_LP_Response North Weston Wood FINAL.pdf (764 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		they can be more easily reached by a greater number of people (particularly when the Portishead rail link opens), or alternatively, to the east of the town, within the flood zone, where they would be classed as less vulnerable forms of development, as opposed to housing, which is a more vulnerable form of development.	
Sylvia Holliman		<p>1. needs to read - To ensure the retention of sufficient local high quality employment opportunities in the town.</p> <p>4. To identify opportunities for affordable residential development on brownfield sites.</p> <p>Even the smallest release of green belt land would set a major precedent and potentially lead to the loss of much more. This must be resisted.</p> <p>Any future development should be either employment or affordable housing, until such time as an adequate level of infrastructure is in place for the whole town.</p>	
WENP	West of England Nature Partnership	We welcome the development of a Town Vision to enable residents to help shape the Local Plan.	
Wessex Water (Ruth Hall)	Wessex Water	<p>Urban regeneration and redevelopment offers opportunities to remove surface water flows from foul systems, which will reduce sewer flooding and improve water quality. Wessex Water will want to safeguard any strategic sewer routes if these are affected by future development.</p> <p>The Local Plan seeks to support the successful delivery of the re-opened Portishead rail connection. Plans for the Portishead railway station must not affect the operation of the adjacent Town Harbour Road Sewage Pumping Station (SPS). Foul drainage flows from the majority of the Portishead catchment drain to the Town Harbour Road SPS for onward transmission to Portbury Wharf sewage treatment works. The works to the railway will also impact on the trunk foul sewers serving Town Harbour Road SPS and reinforcement works are required to protect these strategic assets. Discussions with North Somerset Council regarding these works are ongoing. "Successful delivery" will only be achieved where the operation of the SPS remains unimpeded.</p>	
Weston Town Council	Weston-super-Mare Town Council	While Weston is willing to take its fair share of development the towns of Portishead Nailsea and Clevedon and large villages must also be required to take their fair share including adjusting the green belt boundary if necessary.	
Wrington Parish Council	Wrington Parish Council	Portishead is also to consider "small scale Green Belt releases" which again contradict NSC's policy of protecting Green Belt boundaries. This is the thin end of the wedge.	

Document Part Name

Q5. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>We write on behalf of Vence LLP to make representations to the Local Plan 2036 Issues and Options Document (September 2018) prepared by North Somerset Council. In particular, this letter makes specific comment on the proposed Plan with respect to its impact and relevance to the land north of Metrobus at Ashton Vale, which is currently being discussed with the officers in both Bristol City Council (BCC) and North Somerset Council (NSC) as a potential development site for c. 500 residential dwellings.</p> <p>The representations that follow, outline a broad degree of support for the direction of the issues and options document, offering comment largely in respect of how the more detailed policy to follow at a later plan preparation stage might make the most of opportunities.</p> <p>Chapter 2; Section 5 – Green Belt</p> <p>We note NSC’s stance that no Green Belt will be released to support strategic housing allocations. Vence LLP offer no view on this nor on the effect it may have on the Council ability to meet its objectively assessed needs. We do note, with interest however, point 4. on page 15 and the fifth bullet point on the same page, which, respectively, read as follows:</p> <p>“4. The potential for considering the future of land parcels in the Green Belt now contained by the South Bristol Link Road.”</p> <p>And</p> <p>“Consider local Green Belt changes in locations identified as making only a limited contribution to Green Belt purposes. This include consideration of the land inside the South Bristol Link in conjunction with Bristol City.”</p> <p>The first point identifies a key issue and the latter a means to address it. Vence LLP fully support the Council in this matter and with specific respect to the land north of metrobus in Ashton Vale. BCC’s Local Plan Review February 2018 identified the land north of metrobus as both having the potential for development and the potential for release from Green Belt (policy CDS10). This site offers the Joint Spatial Plan area the opportunity to deliver c. 500 dwellings and BCC have identified in principle support for it in their latest Local Plan review document. To facilitate this growth, as is known to officers with NSC, there is a need to provide access into and out of the site via the existing infrastructure around the Long Ashton Park and Ride (B3128) , within NSC Local Authority area. For a plan to be found sound at Examination, there is a duty on the Local Planning Authority to demonstrate co-operation with neighbouring authorities. This matter is therefore vital to the soundness of the NSC Local Plan. If BCC is to propose the release of Green Belt in this location to deliver their housing target, NSC should also release it from Green Belt.</p> <p>This is entirely in accordance with the options identified in Chapter 2; Section 5 of your draft Local Plan. It will facilitate growth around the South Bristol Link Road and requires the removal of land which now, due to the metrobus road network creating new defensible boundaries is entirely on land which can be considered to make a low contribution to the purpose of Green Belt. This is as evidenced by the Stage 2 Green Belt Assessment (November 2016) prepared in support of the Joint Spatial Plan, which found the land north of metrobus to make limited contribution to the purpose of Green Belt (cell 96e). The land within NSC between the park and ride and cell 96e was not formally assessed, but in any case, contains existing urbanising features which, as noted by the Green Belt appraisal for cell 96d, limits the lands ability to prevent encroachment into the countryside.</p> <p>Furthermore, its release would have no impact on the green buffer being maintained between Bristol and Long Ashton. As the land in question, within NSC, would be used to facilitate roads/access routes only, its impact on the landscape sensitivity, identified by the Landscape Sensitivity Assessment Addendum Report (August 2018) as being of high sensitivity, would be minimal, particularly when considering its location between the existing park and ride and the David Lloyds Sports Centre (also considered a landscape of high sensitivity). We would request that the Addendum report considers this location and its particular existing landscape quality in further detail as the high level of sensitivity does not appear to relate to the current urban context, in this respect a more detailed sub-area breakdown may be required to achieve a more robust appraisal.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
A Mathison		<p>40% of land in North Somerset is Green Belt. Just 2% is required to build 4500 houses close to employment on the south side of Bristol. Furthermore the new South Bristol line road is built on green belt, Bristol Airport is on green belt and North Somerset Council granted planning permission for a temporary extension to the Silver Zone car park on green belt land at Bristol Airport.</p> <p>Rather than build on 2% of North Somerset's green belt North Somerset Council would rather create a dormitory town in the countryside adjacent to the Mendip Hills AONB.</p> <p>North Somerset Council is encouraging urban sprawl to leap-frog over green belt to create a soulless dormitory town on good agricultural land with all the associated negative impact on the ecology.</p> <p>All the adjacent Local Authorities have proposals to build on green belt.</p> <p>It is possible to reallocate this 2% of green belt.</p>	
Abbots Leigh Parish Council		<p>The Councils have in the past emphasised the importance of the Green Belt. It plays a crucial role in preventing the sprawl of Bristol - especially from large scale speculative housing proposals - and there is already some ribbon development (Pill Road and Martcombe) which, without retention of the Green Belt, could spread all along the A369 from Beggar Bush to the M5 Motorway. At the same time, we recognise the need to provide housing in North Somerset and preparatory work on the Neighbourhood Plan has assessed the possibility of identifying small sites in the Green Belt for housing for local people (see also below on Settlement Boundaries).</p> <p>Changes to the existing Green Belt are needed in our area to recognise existing built development (e.g. Ham Green) and to introduce a formal settlement boundary for Abbots Leigh. Beyond this we would not wish to lose any of the Green Belt which serves an important function in maintenance of the distinctiveness and identity of the various communities within the Neighbourhood Area (Easton-ion-Gordano, Pill, Pill, Ham Green and Abbots Leigh).</p>	
Alex		<p>The Green Belt needs review. It was put in place in different times. The total area of Green Belt should not be reduced, but areas of less value could be replaced by similar protections of the areas actually valued by the people of Bristol as their recreation areas – for example Mendips, and the hills and woods to the south and west of the airport.</p>	
Alice Barratt		<p>I also make a comment on question 5 relating to green belt.</p> <p>40% of land in North Somerset is green belt, just 2% is needed to build 4,500 houses close to the jobs in Bristol.</p> <p>The green belt is strangling Bristol and if shifted a bit would allow for houses to be built near to where the majority of jobs and leisure activities are.</p> <p>Instead North Somerset are planning to build a garden village along way away from Bristol in beautiful countryside where there are no local jobs or leisure facilities.</p> <p>Many developments have already happened in the green belt. For example, the south Bristol link road, Bristol airport, the extension to the silver zone car park at Bristol airport.</p> <p>North Somerset is encouraging urban sprawl in leap frogging over green belt to create a soulless dormitory town with no jobs on good agricultural land and adjacent to the highly sensitive Mendip Hills (AONB).</p>	
AllyJ		<p>Q5: I disagree with the conclusions given in this section about the Greenbelt. It is time to revise the Greenbelt area policy to promote development nearer Bristol where residents can use public transport instead of cars to access work places. The council is willing to make changes near current settlements with the new link road and the</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		airport expansion so why should it not reassess the whole area. Urban sprawl should not leap-frog over the Green Belt to create new towns away from jobs and good transport links.	
Andrew		It seems that maintaining the existing green belt is being used as an excuse for bad development, and the destruction of the rural character of North Somerset. It would be far better to carefully re-designate some green belt at Ashton Vale to enable sustainable residential development there, connected to employment opportunity and public and sustainable transport options than to destroy undeveloped rural settings at Churchill and Banwell, which will cause massive increases in car journeys in and around North Somerset and in to and out of Bristol. The JSP needs to reconsider the re-designation of Green Belt and the North Somerset consultation should wait until the JSP is agreed.	
Andy		<p>I listened to Radio 4's news item on Wednesday 24th October regarding the environmentally sustainable building of new homes on green belt / edge of town land.</p> <p>The main findings were that town planners / local council were too quick to to approve the building on this type of land, to meet central government expectations on meeting new housing numbers. The issue was that where these new houses were being built, there were no proper transport routes, no local facilities (schools, shops, pubs, etc etc). Which meant that those buying the homes were forced to use their cars. This meant increased traffic, on roads not suited and increased pollution from the forced commuting.</p> <p>The building on North Weston Woods perfectly fits this radio broadcast.</p>	
Aston	Aston and Co UK	<p>This section of the consultation starts with a clear illustration of the challenges facing North Somerset by producing a map that illustrates the three major constraints washing over the majority of the authority's area: The Bristol and Bath Green Belt, The Mendip Area of Outstanding Natural Beauty and Flood Risk from tidal and fluvial sources with much of the Gordano Valley and Somerset Levels lying at sea level.</p> <p>The Housing and Land Availability Assessment reproduces a process chart from the National Planning Policy Practice Guidance (NPPG), identifying the key stages of the methodology recommended for the evaluation of sites for future development (page 6).</p> <p>The NSC Housing and Land Availability Study (HLAA) starts off by using this process to sift all the potential sites identified as part of local plan consultations.</p> <p>The study then factors in the potential housing land identified at the Strategic Development Locations (SDLs) within the publication version of the JSP which is currently undergoing examination.</p> <p>The HLAA explains at page 10 how the process flow chart in the NPPG was then used for a part 1 assessment by considering all sites against a key list of constraints:</p> <ul style="list-style-type: none"> • Sites designated Site of Special Scientific Interest (SSSI) • Sites entirely within the Green Belt • Sites entirely covered by Local Green Space • Sites entirely within the Area of Outstanding Natural Beauty (AONB) 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • Sites entirely within flood zone 3b • Sites with no boundary adjoining an existing settlement boundary (unless site is brownfield) <p>The process adopted by NSC has the immediate effect of disregarding all sites within Green Belt and the justification given is:</p> <p><i>“The submitted JSP has not identified a strategic requirement for the North Somerset Local Plan to release land in the Green Belt for housing development and the proposed SDLs are all located outside the Green Belt. The assumption in this study is therefore that new sites in the Green Belt are unsuitable as a matter of principle due to them being inappropriate development in the Green Belt. Clearly if the approach taken in the JSP were to change through the examination process, there are a range of Green Belt sites that could be considered subject to exceptional circumstances being demonstrated and progressed through the plan making process and in consultation with local communities” (para 3.13, page 13).</i></p> <p>This methodology is unsound, will unnecessarily remove valuable sites in sustainable locations and fails to make use of evidence gathered within the JSP Stage 1 and Stage 2 Green Belt review.</p> <p>The West of England JSP Green Belt Assessment Stage 2 (Nov 2016) makes it clear under Conclusions and Further Work (page 21) that the report was prepared as a strategic piece of work:</p> <p><i>“3.43 Considering cells in combination, no substantial areas have been identified which make only a limited contribution to Green Belt purposes. There are no extensive tracts of land which, notwithstanding their current Green Belt status, have been shown to be unnecessary to keep permanently open by reason of their limited contribution to Green Belt purposes (para 3.43).”</i></p> <p>It is the role of NS during preparation of a replacement Local Plan to:</p> <ol style="list-style-type: none"> 1. Examine, test and work up the detail for potential development sites identified within the West of England JSP of strategic consequence (>500 units) against the relevant 2. To also look at non-strategic level for opportunities (<500 units) that may present themselves at local plan level to achieve much needed sustainable employment and housing development. <p>Good plan making requires a top down strategic focus and a bottom up local focus in assessing wide ranging sites against relevant criteria to achieve the best outcomes.</p> <p>The Green Belt Stage 2 study should therefore be taken as the starting point of evidence for looking in greater detail and seeking to establish the optimum local land uses at non-strategic level. This may involve nip and tuck of the Green Belt where it can be demonstrated that the fundamental purposes of the GB will not be compromised.</p> <p>Such an approach is highly likely to be able to provide more sustainable long term housing land solutions than the creation of the proposed new garden villages which will necessarily require significant new infrastructure and will create additional transport and traffic effects on rural highway networks.</p> <p>Under ‘Further Work’ the GB study stage 2 states:</p> <p><i>“When determining future detailed Green belt boundaries the four authorities may wish to consider whether it is necessary to continue to include the cells making a limited overall contribution to Green Belt purposes” (para 3.46) and;</i></p> <p><i>“The four authorities may wish to consider using the approach set out in this assessment to assist in any detailed review of Green Belt boundaries which may be necessary in their Local Plans.” (para 3.47)</i></p> <p>It does not suggest that any land affected by GB constraint should be ignored and not reviewed under the replacement plan process. To do so would be contrary to good planning practice.</p>	

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		<p>Government Guidance for the completion of a Housing Land Availability Assessment (HLAA) study Published 6.03.14 by the Ministry of Housing Communities and Local Government sets out the following helpful information:</p> <p>How should sites/broad locations be identified?</p> <p><i>When carrying out a desk top review, plan makers should be proactive in identifying as wide a range as possible of sites and broad locations for development (including those existing sites that could be improved, intensified or changed). Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly, including where they severely restrict development. An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints, rather than simply to accept them.</i></p> <p>The process must start broadly and not be fettered by unnecessary rules. It must re-test potential land against previously defined constraints. There is evidence gathered within the JSP Stage 1 and Stage 2 Green Belt studies that should be used to evaluate sites.</p> <p>In a number of cases, developers and land promoters will have undertaken detailed constraints work (ecological reports, landscape assessments, etc.). That information should be drawn into the forward plan process and any such evidence in support of promoted sites should be tested/objectively reviewed.</p> <p>What types of sites and sources of data should be used?</p> <p>A table of potential sources is provided and this includes: “<i>Sites in rural locations, Sites in and adjoining villages or rural settlements and rural exception sites and Potential urban extensions and new free standing settlements.</i>”</p> <p>This does not mention screening in or out Green Belt sites but common-sense would suggest this should not be an arbitrary means for prematurely discounting sites from further evaluation. The objective should be to create the best possible forward plan that makes the optimum use of available land resources to produce the most sustainable development.</p> <p>Key professional organisations including the Landscape Institute and Paul Cheshire, Professor Emeritus of Economic Geography, London School of Economics and Political Science recognise the need for Green Belts to be multi-functional to deliver social and environmental benefits. The Landscape Institute rightly concluded that the Green Belt requires ongoing re-evaluation to ensure its continued relevance (Green Belt Policy – April 2018). In particular they correctly highlight that since the 1950s, advances in digital technology including GIS mapping, lidar profiles, remote satellite sensing, etc. has given us the ability to analyse and plan development in a way that was not possible when the GB concept was first introduced. Plan making is the appropriate time to use such technology to revisit the GB.</p> <p>The Royal Town Planning Institute (RTPI) led a debate among its members on the location for new housing and published a policy statement ‘Where should we build new homes’ in November 2016. They recognise the continued importance of the GB but acknowledge that development within existing built up areas will not meet all our needs and that after 60 years there is need for a wider debate “<i>it is important to revisit the purposes that green belts need to fulfil over the coming generation.</i>”</p> <p>Wide ranging sources of data must be used during the evaluation of potential development land for example, any evidence submitted in support of sites by land promoters and developers and EIA screening and scoping opinions. The evidence submitted in support of land under the formal ‘Call for Sites’ should be tested and fed into this evaluation process and there is no indication that this has been done.</p> <p>In the case of the Land at Black Rock (Site reference HE18124) detailed reports have been produced:</p> <ul style="list-style-type: none"> • Planning Statement – Aston and Co • Bristol and Bath Green Belt Report – Aston and Co • Cultural & Heritage Report – Aston and Co • Landscape and Visual Impact Assessment – The Landmark Practice (1 of 2) • Response to NSC’s Evidence Base Landscape Sensitivity Assessment (2 of 2) 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • Ecological Constraints and Opportunities – The Landmark Practice (1 of 2) • Summary of Full Seasons Ecological Survey Work – The Landmark Practice (2 of 2) • EIA Screening Request and Response • Flood Risk Assessment – Aston and Co • Transport Note – Connect Highway Consultants <p>This detailed work has clearly defined the site constraints and opportunities and initial Architectural Design Layouts will now be developed.</p> <p>These documents are supplied as separate pdf ‘Appendices’.</p>	
Aston	Aston and Co UK	<p>The Green Belt Report at Appendix A sets out the original purpose of the Green Belt.</p> <p>It is agreed that the Green Belt has served a useful purpose but it is essential that in planning for the next 20 years at times of housing crisis in the UK that the review process starts with the consideration of all land use options. This approach is supported and promoted by the Landscape Institute in their 2017 policy briefing paper to Government.</p> <p>The optimum outcomes will only be produced if the requirements for housing, employment, education, transport, recreation and all uses are considered against available supply and then each is tested for viability. A plan must be capable of delivering sustainable outcomes within the plan period, or the existing housing crisis will worsen.</p> <p>There is no need to sweep away the Green Belt but the time has come for it to be reviewed in all forward plan making processes. Inevitably, sustainable development will in general be located around existing large service centres. The rigid enforcement of Green Belt is currently producing the counterintuitive proposal for new ‘garden villages’ to be established.</p> <p>The locations selected for the proposed garden villages are in rural areas remote from the established settlements and large service centres. The initial case made in the West of England JSP for viability by BNP Paribas was not robust and left significant doubt over how infrastructure funding requirements would be met. That is not plan making with sustainable land use at its core.</p> <p>(It is acknowledged that additional viability data has just been published in a consultation that overlaps with this NSC Local Plan consultation (WED005 12.11.18 until 7 January 2019) and a separate response will be made to that information.</p> <p>In general terms we agree with the need to review the Green Belt for the purposes stated but the process described is unnecessarily narrow and it should also embrace the following:</p> <ul style="list-style-type: none"> • All available land identified by the Local Planning Authority or submitted during the Call for Sites and other such processes should be reviewed and tested for all uses and not arbitrarily discounted if they are situated in Green Belt. For example, to discount all sites surrounding Portishead’s settlement boundary is illogical and does not comply with Government plan making guidance nor extant policy • The West of England JSP Strategic Green Belt evidence should be utilised as well as any other tested evidence submitted by land promoters, owners and • Detailed consideration must be given to the allocation of land in appropriate locations adjacent to settlement boundaries, outside of the immovable flood risk areas (which cannot be sustainable) where there are established larger settlement services and transport links already in existence or planned and funded. Such a solution could provide a number of non-strategic sites (under 500) that collectively remove the need for one or more garden villages. <p>(It is acknowledged that additional data to justify the SDL locations has just been published in a consultation that overlaps with this NSC Local Plan consultation (WED004 12.11.18 until 7 January 2019) and a separate response will be made to that information.</p>	

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		<p>Key Issue, Point 2 – Yes villages, hamlets and smaller assemblies of houses within open countryside and washed over by Green Belt need balanced policies applied so that they can remain vibrant economic centres and are not blighted. There will be opportunities within these locations for development such as home offices, annexes for elderly relatives, Live-Work units to make use of fibre to the premises and generate local employment without the associated commuting.</p> <p>Such opportunities may also arise within or adjacent to the settlement boundaries and here to there needs to be some flexibility to ensure rural vitality and prevent stagnation.</p> <p>Open spaces within rural villages do need protection so that the character and feel of such rural locations is not lost but there must remain some flexibility. Each land parcel will have its own constraints and opportunities. Where a robust case is made for development and such development would help retain or enhance rural vitality, reduce commuting, or increase local employment opportunities then it should be considered on its merits.</p> <p>Failure to deal with this effectively/flexibly will lead to areas stagnating and lacking the investment necessary to ensure long term vitality.</p> <p>The Government have relaxed some of the General Permitted Development Order (GPDO) rules for re-use of redundant former agricultural buildings. That was welcome but a lack of flexibility on associated necessary building works creates perverse outcomes.</p> <p>Former simple barns of steel frame and asbestos cement roofs become huge converted spaces of no external design character to ensure legal compliance under the prescriptive GPDO rules.</p> <p>Planning needs good design and sustainable development. Far better to have a decision making process within policy which follows logic:</p> <ul style="list-style-type: none"> • Has the building been in existence for 10 years or more? • Was its last use agricultural? • Is that use no longer required and if so why not? • Would it benefit from GPDO change of use rights? • Is the building is a sustainable location? • If the answer to each is 'Yes' provided design is agreed and the footprint and volume reflects the existing building then why not allow replacement to achieve the most sustainable long term solution and optimum use of land. <p>So in principle we agree that this is an important consideration but it needs to be even wider and innovative in its thinking. The Green Belt Report demonstrates the original intention and purpose which was to contain the merger of Bristol and Bath.</p> <p>We support and agree with the Landscape Institute:</p> <p><i>“Green Belt policy, in its current format, fails to reflect the advances that have been made since the 1950s in a range of planning services. For example, the advent of digital technology, such as geographical information systems and remote satellite sensing, has given us the ability to examine, understand, analyse and plan for development in a way that was not possible when the concept of ‘Green Belt’ was introduced.”</i> (see here, page 2 point 3)</p> <p>The West of England JSP Green Belt Review evidence also needs to be used not ignored.</p> <p>All land use options should be considered from first principles to identify the best long term sustainable land uses and that will require a wholesale re-think of the application of the Green Belt. There is no need for large changes but we must remove the blight that it has created for rural settlements/hamlets/villages and establish whether small changes could avoid the need for garden villages and provide a more sustainable forward plan solution.</p> <p>If the suggested controls/tests are made why not be flexible and enable replacement of redundant rural buildings over 10 years old with a new employment unit, live-work unit, or residential unit for a local person, something of a size/volume restricted to that of the original building (or less), but fit for the future, sustainable and of good (enhanced) design.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Avon Wildlife Trust	Avon Wildlife Trust	Considering the weight of importance given to protecting the Green Belt by national government and the Council we feel that more should be asked of the Green Belt in terms of the Natural Capital that it produces. This is especially true of its ecological value, which is often minimal. We would strongly support similar for a multi-functional strategic green infrastructure network, which would safeguard key ecological corridors and associated biodiversity as well as opening up more opportunities for active travel and recreation, supporting with flood management, improving water quality and helping filter polluted air and sequester carbon.	
B Moss		Development in Green Belt is acceptable when of a zero-carbon, low-impact, 'one-planet-living' scenario, or community-led self build	
backwell		I do not agree with the proposals for Backwell. Backwell is designated as a "Service Village" and the plan states "Service Villages are locations for small scale development of an appropriate scale either within or abutting the settlement boundary." I note. "5. Both the government and the council attach great importance to the Green Belt and no strategic changes to accommodate large scale housing proposals are being put forward in this Plan." 700 additional homes on Green Belt land that will raise the housing population by some 40% cannot be called 'small scale'? On the Plans own definitions and the government's desire to maintain Green Belt land, the development is inappropriate and unsustainable.	
Backwell Parish Council	Backwell Parish Council	BPC welcomes the key issues identified by NSC in respect of Green Belt ensuring its boundaries are fit for purpose and capable of meeting the long-term development needs of the District, beyond the plan period to 2036. BPC supports consultation with town and parish councils in respect of reviewing Green Belt boundaries and allocating sites. Where land makes a limited contribution to the purposes of the Green Belt, its removal and the designation of other land (such as the Backwell Lake area) as Green Belt should be considered, where appropriate.	
backwellresidents	Backwell Residents Association	As outlined above, BRA supports the key issues identified by NSC in respect of Green Belt to ensure the boundaries are fit for purpose and capable of meeting the long-term development needs of the District, beyond the plan period to 2036. Where land makes a limited contribution to the purposes of the Green Belt, its removal should be considered, in order to accommodate sustainable growth. In addition, the designation of other land as Green Belt should be considered, particularly where the separate identity of settlements could be compromised by future planned development. A comprehensive review of the Green Belt is still required at the strategic policy level, through the JSP to ensure new housing is in the most sustainable locations, well-related to employment, retail, higher order services and infrastructure. In the absence of strategic modifications, the Green Belt restricts growth to the major urban areas, particularly Bristol, and forces development to leapfrog its boundaries to more rural locations which are heavily reliant upon the private car, such as Backwell.	
Barrow Gurney Parish Council	Barrow Gurney Parish Council	We agree with the proposal to allow some changes to the settlement boundaries to incorporate existing dwellings. However, with regard to Bristol Airport which is washed over by the Green Belt, no expansion of the planning should be permitted. We urge the Council to do all it can to protect North Somerset from further urban sprawl from Bristol towards the Green Belt adjacent to Long Ashton.	
BHFP		Greenbelt north of Nailsea should be protected and not considered for development.	

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Blagdon PC	Blagdon Parish Council	<p>Blagdon Parish Council (BPC) welcomes the assurance that no strategic changes are being put forward in the Plan.</p> <p>Maintaining a substantial green separation between Bristol and North Somerset is vital although a boundary review warrants consideration and small-scale redevelopment in some areas should be permitted.</p> <p>North Somerset should ensure that the "rampant" expansion of Bristol Airport gives greater consideration to the immediate impacts on local communities, transport networks and, in particular, green belt space. The incursions into green belt from the current expansion rate is concerning and must not be overlooked.</p>	
Bridget Petty		<p>Green Belt should be re-designated at Ashton Vale to enable sustainable development rather than destroy the rural character of North Somerset. Green Belt has a value but it was established in a different era, when the impacts of having people travel by car daily were not known. People need to be encouraged to live closer to work and walk or cycle. Living further from employment opportunity will only make our transport problems worse.</p>	
Bristol City Council (Local Plan)	Bristol City Council local Plan team	<p>Bristol City Council welcomes the consideration of the future of land parcels in the Green Belt inside the South Bristol Link and looks forward to working with North Somerset Council on the future of these areas.</p>	
Brockley Parish Council	Brockley Parish Council	<p>Brockley Parish Council mainly agree with the key issues, in particular, the suggestion that the green belt within the South Bristol Link should be considered for development. The suggestion in section 7 that Bristol Airport should be allowed to encroach on the green belt should be resisted.</p>	
Burrington Parish Council	Burrington Parish Council	<p>A strategic review of the Green Belt should be undertaken for the JSP. The Green Belt was conceived at a time when there was not universal coverage of local development plans. Today there are much more appropriate ways to define the boundaries of settlements and to protect valued countryside. The extensive Bristol-Bath Green Belt extends far beyond the area that can be justified by current criteria for Green Belt boundaries in the National Planning Policy Framework (NPPF). Paragraph 138 of the NPPF states that the need to promote sustainable patterns of development should be considered when reviewing Green Belt boundaries. In this case, the Local Plan is unduly constrained by the Council's unwillingness to review the Green Belt, resulting in strategic development locations being proposed in unsuitable and unsustainable locations beyond the outer boundary of the Green Belt, such as Churchill.</p>	
C Chaplin		<ul style="list-style-type: none"> ◦ 40% of land in North Somerset is Green Belt. Just 2% is needed to build 4,500 houses close to the jobs in Bristol. ◦ The Green Belt is strangling Bristol. It is not sacrosanct/untouchable. <ul style="list-style-type: none"> ▪ The new South Bristol Link road is on Green Belt. ▪ Bristol airport is on Green Belt ▪ North Somerset Council (October 2018) granted planning permission for a temporary extension to the Silver Zone car park on Green Belt at Bristol airport. ◦ Rather than build on 2% of North Somerset's Green Belt NSC would rather create a dormitory town in the countryside adjacent to the Mendip Hills AONB. ◦ North Somerset Council is encouraging urban sprawl to leap-frog over Green Belt to create a soulless, dormitory town on good agricultural land. ◦ All the adjacent Local Authorities have proposals for development on green belt. ◦ It is possible to reallocate this 2% of Green Belt. 	

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C Twine		<p>Green Belt</p> <p>4.5 We are supportive of the identification of appropriate Green Belt releases in certain locations within the District. This is largely because there are a number of sustainable locations in the Green Belt in North Somerset.</p> <p>4.6 In the case of Winford, the Green Belt washes over the entire settlement and beyond the defined settlement boundary. As a result, there are limited opportunities at Winford to deliver housing given the level of constraint imposed by the Green Belt.</p> <p>4.7 We consider that there should be a consistent approach to settlements within the Green Belt, and all villages, including Winford should be inset.</p> <p>4.8 We consider it likely that there will be an unmet affordable housing need both within the Parish of Winford and within adjoining Parishes which are equally washed over by the Green Belt designation.</p> <p>4.9 As we touch on below, the Winford settlement boundary for obvious reasons is tightly drawn around the existing built form at Winford. Accordingly, in the scenario where there is an affordable housing need the only way this is likely to be met is through schemes of 11 or more dwellings given national guidance on affordable housing thresholds.</p> <p>4.10 As a result, there are likely to be limited or no opportunities to deliver such a site within the existing settlement limit given there are limited brownfield opportunities. Given the wording of existing Policy DM12: Development within the Green Belt' many other sites are unlikely to be found acceptable to the Council.</p> <p>4.11 If there is a commitment to meeting the community's needs, as set out within the SA Scoping Report, then a solution is needed to this policy conflict. We would suggest that there is merit for the Council to undertake a Green Belt review across the District in part to understand whether relevant parts of the Green Belt are still meeting the functions set out at Paragraph 134 of the NPPF 2018.</p> <p>4.12 Such a review would also help enable local communities to make informed decisions about areas of land in and around their settlements which would be suitable for release to help address an identified affordable housing need.</p> <p>4.13 We would suggest that the most suitable opportunity to achieve this within Winford is our clients site.</p>	<p>Mrs Catherine Twine.pdf (1.3 MB)</p>
Chris		<p>The proposal to build houses should be in North Somerset Green belt closer to Bristol where the jobs will be. Rather than build a dormitory town no where near any jobs, it makes no sense</p>	
Chris Butler		<p>By stopping Bristol/Bath expansion into green belt, development is 'leap frogging' green belt and destroying rural communities by creating 'garden' villages, producing more longer commuting to cities and increasing carbon footprint! Where is UK Food Security if our agricultural farming fields and buildings are housing estates, solar farms or golf courses?</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Chrissy Attenborough		As a user of the Green Belt land for walking and running daily, who lives very near to Tower House Wood, I am opposed to a review of it in order to pave the way for development. Green Belt land should be protected - for the wildlife, for the leisure time of everyone: now and in the future.	
Cleeve Parish Council	Cleeve Parish Council	<p>CPC do not agree with some issues identified in this section. If we believe that climate change is one of the most serious issues facing mankind, greenbelt should not be released for the expansion of Bristol Airport, likewise for park and rides within the greenbelt for airport car parking. Park and Ride car parks will increase vehicle use. But we do consider that land inside the South Bristol Link should be considered for housing as this would be more sustainable and take away from the need for new, costly road infrastructure.</p> <p>We do not consider that the greenbelt should be reviewed through the Hierarchy or Settlement boundaries with the exception of land inside the South Bristol Link. Cleeve Parish is surrounded by green belt which supports a strategic rural gap between Weston and Bristol.</p>	
Clevedon Town Council	Clevedon Town Council	The Council accepts that limited flexibility within the green belt may be necessary. For example, when the junction 20 to Nailsea road is built. The spur for the M5 motorway will have to go via green belt land.	
Cliff Barker	Mr	The Green Belt to the North and East of Nailsea has been identified as a potential expansion area by Nailsea Town Council. Please resist this proposal.	
Collier		<ul style="list-style-type: none"> ◦ 40% of land in North Somerset is Green Belt. Just 2% is needed to build 4,500 houses close to the jobs in Bristol. ◦ The Green Belt is strangling Bristol. It is not sacrosanct/untouchable. <ul style="list-style-type: none"> ▪ The new South Bristol Link road is on Green Belt. ▪ Bristol airport is on Green Belt ▪ North Somerset Council (October 2018) granted planning permission for a temporary extension to the Silver Zone car park on Green Belt at Bristol airport. ◦ Rather than build on 2% of North Somerset's Green Belt NSC would rather create a dormitory town in the countryside adjacent to the Mendip Hills AONB. ◦ North Somerset Council is encouraging urban sprawl to leap-frog over Green Belt to create a soulless, dormitory town on good agricultural land. ◦ All the adjacent Local Authorities have proposals for development on green belt. ◦ It is possible to reallocate this 2% of Green Belt. 	
Congresbury Parish Council	Congresbury Parish Council	<p>We consider the Issues and Options document fails to tackle the biggest single issue that should be shaping the future of North Somerset - a review of Greenbelt land adjoining Bristol. This omission does cast doubt on the objectivity of the council and its current leaders. We find it strange to develop new garden village settlements such as Mendip Spring so far from the major employment centres of Bristol and Weston-super-Mare.</p> <p>We are disappointed that there is no option presented to change the designated 'Greenbelt area' near Long Ashton.</p>	

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Congresbury Parish Council	Congresbury Parish Council	We disagree with the conclusions given in this section about the Greenbelt. We believe it is time to revise the Greenbelt area to promote development nearer Bristol where residents can use public transport instead of cars to access work place. With nearly 40% of North Somerset covered by Greenbelt it has served us well but the time has come to review it. The council is willing to make changes near current settlements and the airport, so why should it not reassess the whole area.	
CPRE Avonside	CPRE Avonside, North Somerset District	The consultation suggests that protection of the Green Belt would not extend to Clevedon, Nailsea and Portishead. There needs to be conformity of policy both across North Somerset and the West of England. A proper Green Belt review is required for the whole of the West of England. Should a review release Green Belt, consideration should also be given to how the prevention of urban sprawl can be contained by extending current Green Belt boundaries.	
Cresten		There should be no net loss of Green Belt. Countryside and farmland preservation is the priority, not building on greenfield. A Green Belt review should consider release of land inside the South Bristol Link road as an alternative to locating strategic development near Churchill and Sandford	
D Yeates	Savills	<p>Above all, we are concerned that the consideration of matters associated with the Green Belt within the Consultation Document strongly implies that the Council has already reached the conclusion that there is no need to revise Green Belt boundaries to accommodate housing. To be clear, the Council cannot soundly reach this conclusion at the Issues and Options stage, particularly given the current significant uncertainty around the JSP's housing target (and the apportioned share of this for North Somerset), the choice and soundness of proposed SDLs and the draft JSP's recognition that exceptional circumstances warranting the amendment of Green Belt boundaries do exist within the plan area.</p> <p>Indeed, there is acknowledgment within the Consultation Document that Green Belt policy has been in place since the early 1950s and that the Local Plan affords an opportunity to consider whether its boundaries are "fit for purpose in the long-term", with no consideration as to whether retaining Green Belt in its current form is compatible with the objective of promoting sustainable patterns of development.</p> <p>That said, the suggestion within the Consultation Document that there could be revisions to the Green Belt to accommodate small scale residential development, is welcome.</p> <p>In our view, in order to deliver the increasing housing requirement, there will inevitably be a need to review the Green Belt throughout North Somerset. In order to ensure that the emerging Development Plan, alongside the JSP plans properly for the identified strategic housing requirement, it is absolutely imperative that the primary and over-riding spatial objective must be the spatial application of the delivery of sustainable development rather than the retention of Green Belt for its own sake.</p> <p>On this basis, it is strongly considered that a measured and considered review of the Green Belt would be the most appropriate course of action to help deliver long term sustainable development in North Somerset. We contend that a review of the Green Belt is necessary to deliver long term sustainable development in North Somerset. In addition, it is contended that the only way to boost delivery of affordable housing is by increasing the overall housing requirement and this will inevitably require a Green Belt review. Furthermore, this review should be attentive to not just large scale strategic development opportunities but also opportunities for future commensurate growth at small scale settlements within the Green Belt, including Flax Bourton and Backwell. Such sustainable development opportunities are currently prohibited by Green Belt, however these opportunities, which will be necessary to support the planned transport improvements in the area through the JSP, should be considered on their merits using a balanced planning judgement, and a Green Belt review would enable this. Such a review could, for example, include consideration of revisions to the Green Belt in areas which no longer make an important contribution to the Green Belt. Such an approach should be applied across the District through a comprehensive Green Belt review, to aid consideration of the most sustainable locations for development.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		Finally, as a general observation, it is concerning that the Consultation Document includes implicit support for the release of Green Belt land at Bristol Airport to meet employment needs, but explicit objection to amendment of Green Belt boundaries for housing. There is no justification or evidence for why there should be differing approaches for residential and employment development.	
Desiree Tomlinson		<p>Green Belt changes in locations identified as making only a limited contribution to Green Belt purposes. This include consideration of the land inside the South Bristol Link in conjunction with Bristol City</p> <ul style="list-style-type: none"> • Changes do need to be made to the Green Belt. The Green Belt as currently designated is strangling Bristol. It is not sacrosanct/untouchable and the production of the Local Plan allows NSC to make changes to the Green Belt • Green Belt is not just green fields: <ul style="list-style-type: none"> ◦ The new South Bristol Link road is on Green Belt. ◦ Bristol airport is on Green Belt land ◦ North Somerset Council (October 2018) granted planning permission for a temporary extension to the Silver Zone car park on Green Belt at Bristol airport. • 40% of land in North Somerset is Green Belt. Just 2% is needed to build 4,500 houses close to the jobs in Bristol. • Rather than build on 2% of North Somerset's Green Belt NSC would rather create a dormitory town in the countryside adjacent to the Mendip Hills AONB. • North Somerset Council is encouraging urban sprawl to leap-frog over Green Belt to create a soulless, dormitory town on good agricultural land. • All the adjacent Local Authorities have proposals for development on green belt. 	
Diane		Please include consideration of extending the green belt between Backwell and Nailsea to include Backwell Lake and the strategic gap.	
Donna Rawlins		<p>We note that 40% of land in North Somerset is Green Belt and that Just 2% is needed to build 4,500 houses close to the jobs in Bristol. This could be reallocated to the area surrounding the Mendip Hill AONB in order to protect it for future generations to enjoy its tranquility including the views from it which are protected by the Countryside and Rights of Way Act 2000.</p> <p>The Green Belt is strangling Bristol. It is not sacrosanct/untouchable. It can be changed in 'Exceptional circumstances'. We believe that the need for 25,000 houses to be built in North Somerset relating to jobs in Bristol constitutes 'Exceptional Circumstances'.</p> <p>The new South Bristol Link road has been built on Green Belt. Bristol airport is on Green Belt and yet can expand seemingly freely into Green Belt land. Why is NSC even considering ruining the countryside adjacent to the Mendip Hills AONB rather than build on 2% of North Somerset's Green Belt NSC?</p> <p>We agree with CALRAG's statement that North Somerset Council is encouraging urban sprawl to leap-frog over Green Belt to create a soulless, dormitory town on good agricultural land. Furthermore, all the adjacent Local Authorities have proposals for development on green belt.</p>	
Dovecote		<p>Regarding all points</p> <p>There is a real risk of losing greenbelt. It is not possible to make a direct swap of greenbelt—existing greenbelt would have to be de-allocated and any new allocation would be a completely separate exercise that may never succeed.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Greenbelt that is highly contributory, such as that to the north of Nailsea, should not be considered.</p> <p>Greenbelt that is of a lower contribution could be considered for highly strategic development such as the airport. Local residential, industrial, business and transport development would not be strategic enough—especially when there are non-greenbelt alternatives.</p>	
Dr Moya Wilson		<p>I believe changes do need to be made to the Green Belt, and many Local Authorities are using small parts of their Green Belt.</p> <p>Green Belt has already been used, for example, to construct the South Bristol link Road, and airport. There is a suitable site on Green Belt, 2% of North Somerset's total, close to Bristol, the new metro line, the South Bristol Link Road, and with the opportunity for a railway station to be built on the existing Weston-Bristol line. Another area of North Somerset could be designated as Green Belt.</p>	
DThorneywork	None	<p>I am concerned that North Somerset has not re-evaluated its green field sites. To develop 4 garden villages where there is poor road networks and poor public transport seems unwise, when there is a large tract of land in Ashton Vale, right by the south Bristol link road, and where there are far superior transport links to the centre of Bristol, the recognised hub of the south west.</p>	
E Folkes		<p>The argument for building on Green Belt is not really valid. I believe that there are other underlying circumstances as to why NSC are not wishing to build on the alternative site around South Bristol.</p> <p>After all the new ring road itself has been built on Green Belt.</p> <p>The airport is expanding onto Green belt.</p> <p>NSC has recently granted planning permission for a temporary car parking extension for the 'Silver Zone' car park on Green Belt.</p> <p>Other councils are building on Green Belt.</p> <p>Whilst I understand that many are concerned about building on Green Belt, why not review it's location. After all it is about time!</p> <p>Why not protect the Mendip AONB. This brings many visitors to the area year after year. We should value the AONB by protecting it by adding Green Belt around it, not strangling Bristol's growth and sensible planning. In reality only a small portion of green belt would be lost around by building the proposed Taylor Wimpey development on it which could be replaced elsewhere.</p>	
E Johnson		<ul style="list-style-type: none"> • 40% of land in North Somerset is Green Belt. Just 2% is needed to build 4,500 houses close to the jobs in Bristol. • Bristol airport is on Green Belt • North Somerset Council is encouraging urban sprawl to leap-frog over Green Belt to create a soulless, dormitory town on good agricultural land. • The Green Belt is strangling Bristol. It is not sacrosanct/untouchable. • Rather than build on 2% of North Somerset's Green Belt NSC would rather create a dormitory town in the countryside adjacent to the Mendip Hills AONB. • North Somerset Council (October 2018) granted planning permission for a temporary extension to the Silver Zone car park on Green Belt at Bristol airport. • All the adjacent Local Authorities have proposals for development on green belt. • The new South Bristol Link road is on Green Belt. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • It is possible to reallocate this 2% of Green Belt. 	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	<p>The Councils have in the past emphasised the importance of the Green Belt. It plays a crucial role in preventing the sprawl of Bristol - especially from large scale speculative housing proposals - and there is already some ribbon development (Pill Road and Martcombe) which, without retention of the Green Belt, could spread all along the A369 from Beggar Bush to the M5 Motorway. At the same time, we recognise the need to provide housing in North Somerset and preparatory work on the Neighbourhood Plan has assessed the possibility of identifying small sites in the Green Belt for housing for local people (see also below on Settlement Boundaries).</p> <p>Changes to the existing Green Belt are needed in our area to recognise existing built development (e.g. Ham Green) and to introduce a formal settlement boundary for Abbots Leigh. Beyond this we would not wish to lose any of the Green Belt which serves an important function in maintenance of the distinctiveness and identity of the various communities within the Neighbourhood Area (Easton-in-Gordano, Pill, Ham Green and Abbots Leigh).</p>	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	<p>The two Parish Councils are engaged in preparation of a joint Neighbourhood Plan with the Neighbourhood Plan Area (NPA) covering the two parishes including parts of Royal Portbury Dock. There is also a Community Land Trust (Pill and District Community Land Trust) aiming to provide affordable housing for local people within the area.</p> <p>2.5 Green Belt</p> <p>The Councils have in the past emphasised the importance of the Green Belt. It plays a crucial role in preventing the sprawl of Bristol - especially from large scale speculative housing proposals - and there is already some ribbon development (Pill Road and Martcombe) which, without retention of the Green Belt, could spread all along the A369 from Beggar Bush to the M5 Motorway. At the same time we recognise the need to provide housing in North Somerset and preparatory work on the Neighbourhood Plan has assessed the possibility of identifying small sites in the Green Belt for housing for local people (see also below on Settlement Boundaries).</p> <p>Changes to the existing Green Belt are needed in our area to recognise existing built development (e.g. Ham Green) and to introduce a formal settlement boundary for Abbots Leigh. Beyond this we would not wish to lose any of the Green Belt which serves an important function in maintenance of the distinctiveness and identity of the various communities within the Neighbourhood Area (Easton-in-Gordano, Pill, Ham Green and Abbots Leigh).</p>	
Ecomotive Ltd		<p>In addition to housing, there is also an increasing need to support local rural livelihoods through creating opportunities for communities to start their own land-based businesses. Where this necessitates the provision of new residential accommodation on-site, this may also constitute development in the Green Belt. Consideration should be given to the potential benefits to the local economy and to environmental sustainability indicators in the assessment of such schemes and we recommend the development of a policy on rural land-based communities in order to provide a framework for doing this. See TAN6: Planning for Sustainable Rural Communities from the Welsh Assembly, which includes provisions for land based One Planet Developments located in the open countryside.</p> <p>Allocation of Green Belt sites for housing should only be done if it is specifically for affordable housing to meet local needs. Allocation of Green Belt to commercial housing development will limit the opportunities for more affordable schemes because it will instantly price them out of the market.</p>	North Somerset Local Plan - submission by Community Led Housing West December 2018.pdf (171 KB)
FF		<p>I support the JSPs importance placed on the protection of Greenbelt, acknowledging that there may be very exceptional circumstances where Greenbelt boundary review may be appropriate to meet local needs.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		I do not support the comments made by Nailsea Town council in relation to questions 5 and 9 of this document, where they propose revising the Greenbelt status of the land north of Nailsea. They propose significant development on this land, detailed in their comments on questions 23 and 24, whereby they put particular emphasis on developing a road, housing and employment sites in this area. This scale of development is not an appropriate suggestion for Greenbelt revision.	
FH		The public investment in the South Link road should be realised by enabling the development of housing in the enclosed Green Belt close to existing public transport links and a large employment centre.	
First Step Homes	First Step Homes (Wessex) Ltd	We would advocate an approach that seeks to release accessible, well-connected non-strategic sites from the Green Belt. As such there is support for review to the Green Belt where sites present an opportunity for additional sustainable growth and where they are currently making a limited contribution to the purposes of the Green Belt, as defined by the National Planning Policy Framework (Paragraph 134, July 2018).	
Flax Bourton Parish Council	Flax Bourton PC	<ul style="list-style-type: none"> ◦ Flax Bourton Parish Council supports a full review of the Green Belt in North Somerset and notes that the other three Unitary authorities in the West of England development area propose minor changes to the Green Belt. ◦ It has also been noted that North Somerset Council has considered a review of the Green Belt at Bristol Airport so Flax Bourton Parish Council feels it is inconsistent not to review the whole of the Green Belt for Strategic Housing Development. ◦ Flax Bourton village is open to a very limited development extension of the existing settlement boundary on the basis that the area within the settlement boundary remains washed over by the Green Belt. Such development MUST be in line with the current character and rural setting of the village and in assessing sustainability, take into account the lack of any services (apart from a primary school) in the village. ◦ The principle of the Green Belt should give protection from “new” roads as well as housing development and the JSP/Local Plan is inconsistent in protecting Green Belt policy from housing yet proposing substantial road/MetroBus routes through quality Green Belt rather than developing housing where new road infrastructure with capacity has recently been built. <p>• <i>We support a review of the Green Belt around the South Bristol Link Road to include “The Vale” and around urban living locations.</i></p>	
G Yule		Why can't these houses (Mendip Spring) be built on 2% of North Somerset Green Belt closer to the South Link road between the A38 and A370 closer to the jobs most will commute to & where sustainable transport links could easily be available. I understand Bristol Airport has had a temporary extension to the Silver Zone car parking which is Green Belt. Why not proceed building on land already owned by developers in North Somerset?	
Gallagher Estates (represented by Barton Willmore)	Barton Willmore	<p>We consider that North Somerset Council's decision to veto the release of Green Belt land to be contrary to both the NPPF and Section 39 of the Planning and Compulsory Purchase Act (2004), which requires local planning authorities to contribute to the achievement of sustainable development.</p> <p>North Somerset SDLs at Backwell, Banwell, Churchill and Nailsea have been identified solely with the aim of jumping the Green Belt. North Somerset's decision to avoid the Green Belt at all costs is a political one, and one that is fundamentally flawed.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
GELLYBELLY		<ul style="list-style-type: none"> The Green Belt is strangling Bristol, but it is not sacrosanct nor untouchable. The new South Bristol Link road was built on Green Belt and the continued development of Bristol Airport is also on Green Belt. North Somerset Council (October 2018) granted planning permission for a temporary extension to the Silver Zone car park on Green Belt at Bristol airport and very recently work has started on the large, obtrusive fire station right on the edge of their boundary. I oppose the idea to create a dormitory town in the countryside adjacent to the Mendip Hills AONB rather than build on 2% of North Somerset's Green Belt. North Somerset Council is encouraging urban sprawl by suggesting a leap-frog over the existing Green Belt to create a soulless, dormitory town (lacking facilities and a sense of community) on good agricultural land adjacent to an AONB. People visit the area because of its current features, most of which have been created by farming, tourism will suffer if all they can see from the Mendips is a large town in a very inappropriate location, and urban sprawl will have ruined a beautiful part of our county. All the adjacent Local Authorities have proposals for development on green belt and it is possible to reallocate Green Belt further down into North Somerset if Ashton Vale was considered for proposals instead of Churchill/Langford. Ashton Vale is the sensible option for sustainable living, close to existing facilities and transport links, public services etc. 	
Geoff Fox		<p>Some considered development on the green belt is good but it must not open any floodgates.</p> <p>Do not allow the developments to be low density as this would waste completely the loss of green belt.</p>	
Grassroots Planning	Grassroots Planning	<p>Q5 (green belt): we agree that options should be considered for the expansion of the airport in terms of the policy approach and amendments to Green Belt Boundaries. Consideration should be given to allocating sites within the Green Belt which are close to the airport, for uses which would be complementary to and offer the flexibility for future expansion for associated commercial uses. We address this matter in more detail in respect of question 38.</p>	
H Parry		<p>The document does ask whether consideration should be given to: "Green Belt changes in locations identified as making only a limited contribution to Green Belt purposes. This include consideration of the land inside the South Bristol Link in conjunction with Bristol City." Changes do need to be made to the Green Belt. The Green Belt as currently designated is strangling Bristol. It is not sacrosanct/untouchable and the production of the Local Plan allows NSC to make changes to the Green Belt</p> <p>Green Belt is not just green fields</p> <ol style="list-style-type: none"> The new South Bristol Link road is on Green Belt Bristol airport is on Green Belt land North Somerset Council (October 2018) granted planning permission for a temporary extension to the Silver Zone car park on Green Belt at Bristol Airport <p>40% of land in North Somerset is Green Belt. Just 2% is needed to build</p> <p>4,500 close to the jobs in Bristol.</p> <p>Rather than build on 2% of North Somerset's Green Belt NSC would rather create a dormitory town in the countryside adjacent to the Mendip Hills AONB!</p> <p>North Somerset Council is encouraging urban sprawl to leapfrog over Green Belt to create a soulless dormitory town on good agricultural land!</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Hallam Land Management Ltd (David Lock Assoc)		HLM consider that Green Belt within the remit of North Somerset should be afforded sufficient weight and that NSC should begin the preparation of a policy for the Land East of Clevedon, which presents a viable alternative to building in the Green Belt.	
Hayes Family and Mr Cope		<p>5.10 National Planning Policy is clear that large-scale residential and / or mixed use development will only be acceptable in the Green Belt via the plan-led system and the release of land in this location.</p> <p>5.11 The value and importance of the Green Belt can be maintained alongside the plan-led release of certain Green Belt land in order to meet housing requirements within Bristol. We do not consider this to be 'sprawl' but realistically the release of this land can meet housing need on the edges of Bristol where demand is highest. Such an approach would reduce the need to travel and out-commuting.</p> <p>5.12 We therefore consider that NSC should undertake a local review of the value of the Green Belt in certain locations and release land where appropriate to meet housing need.</p>	
Ian	Mr	The Green Belt must not be viewed as an inconvenience to developers. Our wildlife and green spaces are vital and must be protected. Even small changes can have a significant negative impact, and could pave the way to further applications to develop the Green Belt in the future that might be more difficult to deny.	
J Gower-Crane		Around 40% of the land in North Somerset is designated as Green Belt but it appears to be mainly Bristol and Bath sprawl that is encroaching into NSC, and Bleadon now, by jumping over the protected Green Belt. How will NSC protect rural agricultural village life?	
J Lyons		<ol style="list-style-type: none"> 1. The Green Belt around Bristol is strangling the city 2. The Green Belt's original intention to stop urban sprawl from the city simply means that house building is to jump over North Somerset's Green Belt and the beautiful countryside will be urbanised here instead. 3. The other three adjacent Local Authorities in the JSP have decided to release Green Belt for house building. 4. A Green Belt assessment should have been carried out for North Somerset Council, it is not evident. The Green Belt is not sacrosanct, even in North Somerset: <ul style="list-style-type: none"> • The new South Bristol Link road cuts across NSC Green Belt • Bristol Airport is on Green Belt • Bristol Airport has just been granted planning permission (October 2018) by North Somerset Council to extend the Silver Zone car park on the Green Belt. 5. The Green Belt south of Bristol is: <ul style="list-style-type: none"> • NOT good agricultural land • NOT used for recreation by residents of Bristol (who instead travel to the Mendip Hills AONB and our villages) • BUT it has a refuse dump • BUT it has an industrial park. 6. 40% of land in North Somerset is Green Belt. Just 2% is needed to build 4,500 houses close to the jobs in Bristol. 7. Green Belt can be reallocated and could be reallocated to this area besides the Mendip Hills AONB. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
J Maycock		<ul style="list-style-type: none"> The Green Belt policy is sorely in need of review: in this plan as with the JSP it is being used to drive development into rural landscapes, particularly those that were never thought necessary to protect. The setting area for Mendip Hills AONB which includes Churchill is not green belt because it was never imagined that it would ever be under threat from the massive development proposed. It is ludicrous that the policy is being used in such a rigid manner to strangle Bristol thereby allowing sprawling urbanisation in the countryside, far from infrastructure and jobs. Sensible developments utilising existing infrastructure, like the Vale, which would use only 2% of North Somerset's Green Belt should not be stopped. Development should be allowed to take place close to where jobs <u>actually</u> exist – not where you <u>hope</u> they might exist. The Green belt policy in this instance is forcing a separation of housing from jobs. Why are there no proposals to reallocate the 2% green belt to Churchill & Langford? All the other unitary authorities in the JSP have proposals for development within the green belt – why not North Somerset? NSC is allowing the Airport to develop – even though it is within the Green Belt! 	
Jan Murray	CALRAG	<p>5. Green Belt</p> <p>5.1. Green Belt was created in 1947. Seventy years later the whole country has seen a population increase from 49,520,000 in 1947 to 65,648,000 in 2016 – an increase of 16,128,000? Bristol has seen a huge percentage of this population increase leading to the Green Belt strangling the city.</p> <p>5.2. Local Plans are when the Green Belt land can be reviewed. No such review appears to have been done for North Somerset.</p> <p>5.3. The other three Unitary Authorities have conceded that Green Belt is strangling Bristol and are prepared to either reallocate or relinquish Green Belt to ensure that their house-building is employment led.</p> <p>5.4. North Somerset has not reviewed the Green Belt in relation to the JSP. The Strategic Planning and Economic Development Scrutiny Panel tasked a 'working group' to review this. This appears to have been shelved. Why?</p> <p>5.5. The Green Belt land in The Vale:</p> <p>5.5.1. Constitutes just 2% of the huge 40% of North Somerset land.</p> <p>5.5.2. Can be conceded in 'Exceptional circumstances'. The request from Government to build 22,000 houses in North Somerset an area with a</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>high percentage of Green Belt and flood plain, constitutes those 'exceptional circumstances'.</p> <p>5.5.3. Could be reallocated to protect the Mendip Hills AONB and the tranquillity that it offers to so many.</p> <p>5.5.4. Is not good quality agricultural land – a former rubbish tip an industrial site already there, an underused golf course and the South Bristol Link Road has been constructed through the centre of it. The Yeo vale here in Churchill is the complete opposite.</p> <p>4</p> <p>5.5.5. Would mean that house-building is 'employment led' a concept that many North Somerset policies allude to.</p> <p>5.5.6. Would mean that North Somerset could take advantage of its proximity to Bristol with its universities, hospitals and employment.</p> <p>5.5.7. No expensive road building as the transport infrastructure is already in place</p> <p>5.5.8. Walking and cycling to work and for leisure and health would be easy to encourage.</p> <p>5.5.9. Is not sacrosanct.</p> <p>5.5.10. Would reduce, not increase CO2 emissions.</p> <p>5.6. Rather than allow just 2% of GB land in the Vale to be built upon, North Somerset Council appears to prefer to:</p> <p>5.6.1. concrete over Grade 1 and 2 Agricultural land calling it BMV (Best Most Versatile).</p> <p>5.6.2. Ruin the views from the Mendip Hills AONB going against the</p>	

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		<p>Countryside and Rights of Way Act 2000.</p> <p>5.6.3. Trash the archeologically important site of Windmill Hill by referring to this tiny but important site as a 'recreation facility' for 2,800 houses when it is privately owned and farmed.</p> <p>5.7. Why has the Vale been excluded from all consideration of Strategic Development Locations?</p>	
John Miners		<p>A review of the allocation of Green Belt is needed. The creation of a Garden village Southwest of Nailsea won't help Nailsea town centre. Development needs to be around the existing infrastructure eg Nailsea School has been struggling for pupil numbers in recent years. The proposed new Garden village for Nailsea includes four new schools 3 miles away from the existing diminishing town centre. Review the Green Belt and relocate all development concentrically.</p> <p>To enable the development north of Nailsea some Green Belt land will need to be re-classified. To balance this</p> <p>Land between Nailsea & Backwell should be designated Green Belt which will preserve the straight gap.</p>	
K Hanson		<ul style="list-style-type: none"> ◦ 40% of land in North Somerset is Green Belt. Just 2% is needed to build 4,500 houses close to the jobs in Bristol. ◦ The Green Belt is strangling Bristol. It is not sacrosanct/untouchable. <ul style="list-style-type: none"> ▪ The new South Bristol Link road is on Green Belt. ▪ Bristol airport is on Green Belt ▪ North Somerset Council (October 2018) granted planning permission for a temporary extension to the Silver Zone car park on Green Belt at Bristol airport. ◦ Rather than build on 2% of North Somerset's Green Belt NSC would rather create a dormitory town in the countryside adjacent to the Mendip Hills AONB. ◦ North Somerset Council is encouraging urban sprawl to leap-frog over Green Belt to create a soulless, dormitory town on good agricultural land. ◦ All the adjacent Local Authorities have proposals for development on green belt. ◦ It is possible to reallocate this 2% of Green Belt. 	
Keith Riches		<p>The South Bristol Link Road has been built through Green Belt, thus seriously degrading its green belt characteristics. 'The Vale' should be given proper consideration for housing (and/or employment) development; situated as it is, on the very edge of Bristol with its existing infrastructure. We fully support the Green Belt concept which was designed to prevent urban sprawl around cities. However, it is now resulting in rural sprawl some distance from the city which destroys agricultural land, has a negative effect on small communities and leads to yet more commuting traffic. If there is a genuine need for all this development, the least worst option is to build in and close to a city. A comprehensive Green Belt Review is needed.</p>	<p>SP JST comment 2016 Riches.pdf (42 KB)</p> <p>SP comment 2017 Riches.pdf (52 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
Kit Stokes	StokesMorgan Planning Ltd	<p>Release Selective land from the Green Belt</p> <p>We are instructed by Mr S. Weeks owner of the builders yard adjoining the Girl Guides HQ Weston Road Long Ashton. Selective release of land from the Green Belt is only sensible.</p> <p>Whilst the Green Belt to the south/south-east of Long Ashton performs an important role in providing separation from Bristol, this Green Belt role can be safeguarded and along with the land at Gatcombe Farm is well positioned to help deliver this. It is located on the western edge of Long Ashton and does not perform a role in preventing the merger of Long Ashton with Bristol. It is therefore able to accommodate a level of residential development as part of a strategic development proposal, and would help in providing flexibility over the spatial arrangement of development areas and retention of open land in order to safeguard the Green Belt role to the east.</p> <p>This site could deliver upto 30 new houses and would amount to development of previously developed land. This is a good example of land in the Green Belt which is of little landscape value and development will have no impact on openness.</p>	builders yard.JPG (110 KB)
KMH1		<p>A review of Greenbelt is important because without it, important criteria around selection of other locations such as the South Bristol Fringe will be overlooked. A review of Greenbelt should in my view allow other criteria to be more equally weighted or considered when evaluating new settlements in a region over a long timeframe. E.g. consider health, environment and well-being to all living and travelling along the journey from a settlement to a job destination.</p>	
Lands Improvement		<p>As stated previously, we are supportive of the identification of appropriate Green Belt releases in certain locations within the Borough. This is largely because there are several sustainable locations in the Green Belt in North Somerset.</p> <p>3.10 We would not, however, expect to see Green Belt land released without a detailed green belt review being undertaken. Whilst we note that some of this work was undertaken as part of the JSP process, some areas were not addressed in as great a level of detail. We would expect a detailed assessment to take place for all potential sites.</p> <p>3.11 We would, naturally, support the release of Green Belt which makes a limited contribution to meeting its five purposes. We acknowledge the example provided within the consultation document where the creation of the New South Bristol Link Road has severely reduced the contribution that land contained by it now makes to the Green Belt. We consider that there are similarities with Easton-in-Gordano and its relationship with the M5 and Junction 19.</p> <p>3.12 There are similar opportunities to release poorly performing parts of the Green Belt in sustainable locations to further meet the residual housing requirement left over from the JSP, especially where there is a demonstrable need to do so.</p> <p>3.13 In the case of Easton-in-Gordano/Pill, the Green Belt boundary directly abuts the settlement boundary and, as a result, there are limited opportunities within the defined boundary (and outside the Green Belt) for new housing proposals to be brought forward.</p> <p>3.14 We are aware that the Pill & District Community Land Trust was formed in 2016 to give the community a greater level of control over the types of houses to be built within the three parishes (Abbots Leigh, Easton-in-Gordano and Pill). A survey undertaken in November 2016 identified a significant affordable housing need:</p> <ul style="list-style-type: none"> • 29 affordable rented homes (2 of which are needed for elderly persons); • 10 households which need intermediate property (shared ownership); and • Potential need from 13 further households (not assigned to a category). <p>3.15 It is unlikely that sites of a sufficient scale to meet this affordable housing need can be found within the defined settlement boundary and in the case of Easton-in-Gordano there are limited brownfield opportunities. As a result, and in consideration of the existing Policy 'DM12: Development within the Green Belt', many sites are unlikely to be found acceptable to the Council under this context.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>3.16 If there is a commitment to meeting the community's needs, as set out within the SA Scoping Report, then a solution is needed to this policy conflict. We would suggest that there is merit for the Council to release sustainable parcels of Green Belt land where it makes only a limited contribution in accordance with the Councils suggestion on page 15.</p> <p>3.17 This would be consistent with the suggested approach around Bristol Airport and the South Bristol Link Road and in order to help inform local communities about locations which may be suitable for release to help address the housing needs (including affordable).</p> <p>3.18 We believe it likely that there will be a number of communities across North Somerset, in sustainable locations, which need to bring forward sites for residential development in order to address the significant housing needs of their community but have been unable to do so due to constraints such as these.</p>	
Lesley Hegarty		<ol style="list-style-type: none"> 1. The Green Belt's original intention was to prevent urban sprawl. Illogically, to persist with NSC's application of Green Belt policy results in proposals such as the Mendip Spring Garden Village, a substantial 2,880 house town to be constructed in pristine countryside 15 miles from Bristol the key source of employment.. This is tantamount to 'leapfrog' urban sprawl but in a wholly rural location alongside an AONB with significant supporting infrastructure costs and substantially greater environmental, ecological and landscape damage. 2. The Green Belt policy requires updating or interpreting in favour of development in locations close to jobs and well serviced by public transport. There is no evidence of any Green Belt re-assessment being considered by North Somerset Council. 3. The other three adjacent Local Authorities in the JSP have decided to release Green Belt for development. 4. The Green Belt is not sacrosanct, even in North Somerset: <ul style="list-style-type: none"> • The new South Bristol Link road cuts across NSC Green Belt • Bristol Airport is on Green Belt • Bristol Airport has just been granted planning permission (October 2018) by North Somerset Council to extend the Silver Zone car park on the Green Belt. 6. The Green Belt immediately south of Bristol: <ul style="list-style-type: none"> • Is not good agricultural land • Is not used for recreation by residents • Has a refuse dump • Has an industrial park. 7. 40% of land in North Somerset is Green Belt. An alternative proposed development in Ashton Vale of 4,500 houses close to Bristol amounts to 2% of the Green Belt. 8. Green Belt could be reallocated eg to areas proximate to the Mendip Hills AONB. 	
Libbyrich		<p>In relation to Portishead the historic Green Belt boundary is drawn very tightly and includes specific historic anomalies. The line should be redrawn at the very least to exclude residential and developed land. The very narrow piece of Green Belt land in my ownership namely Capenor Court Orchard should be considered for removal entirely from the Green Belt as at the original enquiry the Inspector stated he did not consider it fulfilled GB criteria.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Long Ashton Parish Council	Long Ashton Parish Council	<p>LAPC strongly supports the maintenance of the current green belt boundaries. The green belt is intended to be a long term designation which should be respected. LAPC strongly opposes any alteration of the boundary between Long Ashton and Bristol. Any encroachment into this land would be unwelcome and undermine one of its purposes, to prevent coalescence of settlements. We note the suggestion (Item 4) that land parcels “enclosed by the SBL” could be considered for development. This was an issue that was raised at the NS meeting which recommended planning permission for the SBL and was stated “not to be within current plans”. Whilst plans can change this is a disappointing change and one that LAPC would oppose, as this reduces the separation between Long Ashton and Bristol and opens the prospect of development on the western side of the road. Any encroachment into the green belt invites further encroachment in the future.</p> <p>It is important that the functions of the green belt are not eroded by successive changes of use and by developments which are “not inappropriate” or marginally so in the green belt. A significant area of green belt land around Long Ashton is used for sports facilities leading to creeping urbanisation, light pollution and loss of openness with the potential for further built developments. Green belt policies should be reviewed to consider the cumulative effects of developments which are permitted.</p> <p>A detailed commentary related to development of Bristol Airport has been made by the PCAA. LAPC opposes any encroachment by the airport into green belt. The current plans presented by the airport are over ambitious and exceed the capacity of the local infrastructure. Co-operation with Cardiff airport could lead to a more sustainable future. (See also Q38)</p> <p>Development in the flood zones should not be allowed.</p>	
M Abbott		<p>Green Belt</p> <p>The rules governing green belt to the south west of Bristol need to be changed. The Green Belt is not sacrosanct or untouchable, but, rather than build on a very small portion of this, NSC would rather build 2,800 houses in the countryside adjacent to the Mendip hills. The area is far more environmentally, ecologically and landscape sensitive than the Green Belt.</p> <p>All the adjacent Local Authorities have proposals for development on the Green Belt.</p>	
M Clements		<p>My main point is that if the Council are slavishly going to follow the 'No Building in the green belt' policy then the Green Belt urgently needs updating and reviewing. It has been in place since the 1970's and is completely outdated for modern needs and requirements. It has resulted in concentrating building in the main conurbations which has resulted in local people being forced to move into and commute from towns and cities that have resulted in rat runs and crowded towns with no gardens, no parking and worst of all no communities.</p> <p>Young families and the Country need more homes so it is no longer tenable just to say No Building what so ever in villages and existing communities. The current green belt has resulted in the village of Wrington being forced to allow building on the most beautiful part of the village along the river Yeo due to the anomaly of being outside the green belt even though well outside the village fence. Admittedly, this was partially due to the Parishes view of resisting ANY building at all which has diminished the Village, reduced services, facilities and support for local businesses. Many people now need to commute into the village from Weston etc as there are more jobs than houses to service them.</p> <p>Above all, please build houses in the RIGHT place rather than following outdated policies and build homes in communities rather than dormitories resulting in more and more traffic congestion in our Towns. Every community should accept some sensible planning in sensible places to allow young families to remain in their communities.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
M Hayman	.	We support the Council views on the greenbelt. Having access to greenbelt areas improves our physical and mental health and reduces our stress levels.	
Margaret Munro		I think there should be an exceptional change in the green belt to allow development of land inside the south Bristol link where there is employment close by in Bristol and transport infrastructure. This strategy would relieve pressure to build housing on less suitable green field sites.	
Mark Funnell, Planning Adviser, National Trust	National Trust	<p>One of the ways to address Green Belt issues is stated as: "Consider local Green Belt changes in locations identified as making only a limited contribution to Green Belt purposes. This includes consideration of the land inside the South Bristol Link in conjunction with Bristol City".</p> <p>The National Trust is supportive of the Green Belt, and very special circumstances should be demonstrated before Green Belt boundaries are amended. However, where there is a major change in circumstance, such as in the case of the construction of South Bristol Link, it may be appropriate to re-assess the contribution the land inside the road (on its east side) makes to the openness of the Green Belt and the separation of settlements, etc.</p>	
MLC		Modification of the green belt in the area of the South Bristol Link Road should be undertaken to permit development on both sides of that road, though not to the extent proposed by Taylor Wimpey.	es.docx (13 KB)
Moor Park (North Somerset) Ltd (MP)		<p>Adjustment of Green Belt boundaries to allow for the release of strategic development sites in the Green Belt in North Somerset is not foreshadowed in the JSP. As such, there is no locus for the Local Plan to consider allocating sites in locations that are currently designated as Green Belt.</p> <p>It is therefore agreed that the Green Belt issues in North Somerset are limited to local adjustments to boundaries to permit small scale development only. The strategic allocations must conform with the JSP in accordance with the strategic priority to minimise adjustments to Green Belt boundaries by focusing future development on land outside the designation as far as possible.</p> <p>Given that there is no commitment to making strategic adjustments to Green Belt boundaries to facilitate development in more sustainable locations, it necessitates a thorough review of other designations that might serve to preclude development at the most sustainable locations outside the Green Belt. In particular, there is no reference in the consultation document to reviewing the principle of continuing with SG designations, which have a similar effect to Green Belt policies, but which have no locus in national policy set out in the NPPF. That is very surprising, and an oversight, given the findings of the SAP Examination Inspector. The imperative for review of whether, as a matter of principle and consistency with the NPPF, the emerging plan should continue to identify SGs, is set out below.</p>	
Mr and Mrs Dobson		<p>The release of certain locations of Green Belt is a concern, in that it potentially sets a precedent for the exploitation of any greenfield site. With the extreme pressure from central government to provide housing numbers it could lead to the most attractive and profitable sites being developed in preference to say brownfield sites.</p> <p>Has sufficient consideration been given to the wider implications of the creation of 'Strategic Development Locations'? For example, although trip-generation could be managed by the provision of local employment opportunities, traffic will be generated outside of the areas for leisure activity and put pressure on strategic routes like the A370 in Weston super Mare. Local authorities do not currently have the resources to maintain the local infrastructure, and this level of development will lead to further deterioration of assets.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The concern is that the effectiveness of the plan will be affected by a lack of recognition of the impact on the wider area, adjacent authorities and existing assets.</p> <p>Modifications suggested</p> <ul style="list-style-type: none"> • <i>There should be a robust review of the Green Belt and a monitoring regime implemented to ensure that sites in the Green Belt and greenfield sites are protected and not exploited.</i> • <i>The wider implications of the strategic development sites on existing infrastructure and services must be taken into account when funding is allocated .</i> 	
Mr C Booy	-	<p>The consultation document sets out that NSC is expected to deliver some 11,068 homes (total amount required after committed development is removed from the equation). This allows sites for new development to be identified through non-strategic growth sites, as is relevant in this instance.</p> <p>A full-scale settlement review has not taken place since the preparation of the North Somerset Replacement Local Plan (NSRLP) 2007. As a result, settlement boundaries and blanket designations are no longer relevant in some instances. The current consultation seeks to address this issue through (more notably) reviewing settlements in the Green Belt to assess opportunities for site allocations. It is acknowledged that some villages are "washed over" by Green Belt and that this approach eradicates the opportunity for the consideration of much needed small housing sites.</p> <p>Q.5 Green Belt</p> <p>The consultation document acknowledges that around 40% of land in NSC is designated as Green Belt. It is acknowledged to have been an effective planning tool over time, however, it is also acknowledged that in some instances it acts as a preventative factor. In general, we agree with the issues to be addressed as set out within the consultation document. In particular, we welcome the consideration for ensuring that the Green Belt and its boundaries are fit for purpose in the long term and consideration for settlement boundary reviews. The stated consideration for site allocations and boundary reviews in consultation with parishes/town councils for specific local need is also welcomed.</p> <p>The site put forward represents a prime opportunity to embrace the need to deliver homes on a smaller scale, in sustainable locations and with minimal impact on the existing settlements. In general, the Local Plan requires flexibility to consider sites that are somewhat of an anomaly in order to take a pro-active approach to the housing crisis. As it stands, the lack of flexibility within existing policy is stifling necessary development.</p>	
Mr S McNulty		<p>The Mendip Spring area should be preserved (not built on). This development should instead be built (1) to a much smaller scale; and (2) on the outskirts of Bristol, as opposed to the North Somerset countryside. It makes no sense to create an estate of this size in that area.</p>	
N Cooper	Claverham Future	<p>Greenbelt land is a sacred cow. If there is reason to allow Bristol Airport to encroach then it is hypocritical to deny there are other reasons where use of Green Belt (possibly with exchange to other areas of land) could be the answer to sensible provision of housing close to employment. The way in which the plan is set out has a transparent and falsified bias to Weston Super Mare, the fact that we live in adjacent but uncooperative county organisations seeking petty local advantage denies the obvious fact of where people travel and work. The JSP is crazily biased and patently not at all "Joint". Until North Somerset can show that people wish to create massive high paid employment in weston Super Mare is would be best to observe reality and do some real social engineering (place the homes near work).</p>	
N Green		<p>The document does ask whether consideration should be given to “Green Belt changes in locations identified as making only a limited contribution to Green Belt purposes. This include consideration of the land inside the South Bristol Link in conjunction with Bristol City. “</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • Changes do need to be made to the Green Belt. The Green Belt as currently designated is strangling Bristol. It is not sacrosanct/untouchable and the production of the Local Plan allows NSC to make changes to the Green Belt • Green Belt is not just green fields: <ul style="list-style-type: none"> • The new South Bristol Link road is on Green Belt. • Bristol airport is on Green Belt land • North Somerset Council (October 2018) granted planning permission for a temporary extension to the Silver Zone car park on Green Belt at Bristol airport. <ul style="list-style-type: none"> ◦ 40% of land in North Somerset is Green Belt. Just 2% is needed to build 4,500 houses close to the jobs in Bristol. ◦ Rather than build on 2% of North Somerset's Green Belt NSC would rather create a dormitory town in the countryside adjacent to the Mendip Hills AONB. ◦ North Somerset Council is encouraging urban sprawl to leap-frog over Green Belt to create a soulless, dormitory town on good agricultural land. ◦ All the adjacent Local Authorities have proposals for development on green belt. 	
Nailsea Action Group	Nailsea Action Group	<p>All of the proposed strategic development is outside of the greenbelt.</p> <p>The Green Belt is 60+ years old. It should serve the needs of the people not vice versa. Therefore it should protect the countryside and enable new dwellings as appropriate.</p> <p>'Consider allocating sites and review boundaries in consultation with parishes/town councils for specific local needs and in exceptional circumstances' seems like a sensible idea.</p>	
Nailsea Town Council	Nailsea Town Council	<p>The viability of the Local Plan in relation to Nailsea hinges on a review of the Green Belt. The Green Belt boundary has been adjusted over the last 40 years to facilitate the planned growth of the town, and the boundary now does not reflect the development needs of the town.</p> <p>NTC strongly endorses the principles of the Green Belt, and a review would establish whether the stated purposes are in fact being served as intended. A review should determine whether the current boundary constricts the settlement in the most appropriate development locations. It should also determine whether land currently not designated fulfils Green Belt objectives better than land which is designated, thereby avoiding the wholly unacceptable outcome of land more suited to being in the Green Belt being built on in order to avoid reviewing the existing boundary.</p>	
Nash Partnership	Nash Partnership	<p>2.2 We are largely in agreement with the four key issues set out. Key issue 1 refers to a particular need to 'prevent the sprawl of Bristol' which is supported. Policy on this should be worded in accordance with paragraphs 145 and 146 of the NPPF which clearly set out what development is (in)appropriate in the green belt. Compliance with the NPPF (and not imposing constraints beyond this) is particularly important to ensuring that there is enough flexibility in policy to ensure future generations' ability to meet their own needs, which is identified as a main objective of sustainable development according to paragraph 7 of the NPPF.</p> <p>2.3 The second of the key issues asks if there should be more opportunity for communities within the Green Belt to address their local housing and other needs. We are strongly in agreement with this and it is clear that there is local need within the parish of Long Ashton, as proven by recent independent survey data.</p> <p>2.4 As such we propose that local policy wording reflects paragraph 77 of the NPPF which states that in rural areas, planning policies should:</p> <ul style="list-style-type: none"> ▪ support housing developments that reflect local needs 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> ▪ support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this <p>2.5 Alongside this, policy wording should reflect paragraph 136 of the NPPF which states that where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. Therefore the suggestion in section 5 of the consultation document that one way to address Green Belt issues may be to consider allocating sites and review boundaries in consultation with parishes/town councils for specific local needs and in exceptional circumstances is strongly supported.</p> <p>2.6 Section 5 of the consultation document suggests considering local Green Belt changes in locations identified as making only a limited contribution to Green Belt purpose as a response to green belt issues. Assessments of how individual land parcels contribute to the Green Belt should identify specific parts within larger parcels which do not contribute to the Green Belt purposes, to ensure there is enough flexibility in policy to allow the needs of communities to be met more easily on smaller, more acutely specified sites.</p> <p>2.7 Paragraph 134 of the NPPF states that Green Belts serve five purposes. In the case of Long Ashton West, development would not have a significant impact on the sense of Green Belt openness or upon the purposes of including land within the Green Belt as follows:</p> <ul style="list-style-type: none"> ▪ Check the unrestricted sprawl of large built up areas – the site is on the western side of Long Ashton and would not therefore impact on its separation from Bristol. ▪ Prevent neighbouring towns from merging into one another – a substantial green gap between Long Ashton and Nailsea would be maintained. ▪ Assist in safeguarding the countryside from encroachment – the proposed development is immediately adjacent to the existing built form of Long Ashton and would create a natural extension, contained by strong landscaping. ▪ Preserve the setting and special character of historic towns – the site is not adjacent to any of the conservation areas in Long Ashton and through a contextual design approach would enhance the western end of the village to help offset the impact on character that arises from existing, less sympathetic, modern residential development. <ul style="list-style-type: none"> • Assist in urban regeneration – the proposed development is not of a scale that would jeopardise the recycling of brownfield land, given the level of housing need and the limited availability of brownfield land. <p>2.8 For these reasons policy should include clear flexibility to allow locations such as Long Ashton West to be recognised as making only a limited contribution to Green Belt purposes. If policy is not flexible enough to do this there are risks that there will be more constraints to meeting local communities’ housing needs in the most appropriate locations.</p> <p>2.9 The fundamental purpose of Green Belt policy, as set out in the NPPF (para. 133), is to prevent urban sprawl by keeping land permanently open. Whilst the development of Long Ashton West would inevitably result in loss of an element of openness, this is inherently accepted by national policy through the NPPF provision for development of affordable housing. Development would result in a small organic growth of Long Ashton and be viewed against and as part of the existing built up area of Long Ashton and given the extensive tracts of Green Belt to the west, north and south, and as such would not have a significant impact on the sense of Green Belt openness.</p> <p>2.10 It is recognised that in the case of Long Ashton West these Green Belt issues might be considered a ‘moot point’ in light of the fact that since 2014 the site has been designated as a Scheduled Ancient Monument (SAM), following the extension of an existing SAM located at Gatcombe Farm to the west. However in previous pre-application responses Historic England have advised that development of the eastern part of the field would not have a major impact on the significance of the monument, and if they were to receive a planning application for development of that part of the site, it would be concluded that the development would cause less than substantial harm to the SAM, and that the harm therefore would need to be weighed against the public benefits of the scheme.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>2.11 Section 5 of the consultation document also asks if there are other issues and challenges regarding the Green Belt which have not been identified. We believe the issues below would benefit from being recognised and addressed by policy:</p> <p>enhance the western end of the village to help offset the impact on character that arises from existing, less sympathetic, modern residential development.</p> <ul style="list-style-type: none"> ▪ Assist in urban regeneration – the proposed development is not of a scale that would jeopardise the recycling of brownfield land, given the level of housing need and the limited availability of brownfield land. <ol style="list-style-type: none"> 1. Housing affordability and availability as a pronounced issue in in settlements surrounded by the Green Belt <p>Green Belt policy constrains options for housing development and can be a major factor in compounding issues of housing affordability and availability. In January 2018 an independent housing needs survey was carried out within the parish of Long Ashton in order to understand whether there was an unmet need for housing in the parish, including for affordable dwellings.</p> <p>This has shown an acute and pressing need for both tenures in Long Ashton which cannot be met within the existing settlement boundary. It is recommended that this is more explicitly recognised as an issue and a challenge for green belt settlements within the local plan and that policies are drawn up to address these, to ensure that there is sufficient flexibility in policy to allow local needs to be met.</p> <ol style="list-style-type: none"> 2. Transport issues associated with a lack of self-containment and excessive out-commuting are pronounced issues in North Somerset which are being compounded by Green Belt policy <p>Ambitions for greater self-containment of settlements and a reduction in out-commuting as a means of alleviating congestion problems in North Somerset have been a central pillars of planning policymaking in the district for many years. However there has been relatively limited recognition in policy that these problems may be being compounded by Green Belt policy directing development towards Weston Super Mare and to land at Clevedon, Nailsea and Backwell which is outside of the Green Belt. These settlements are all further away from the main employment destination of Bristol than Long Ashton. Whilst it is recognised that the current local plan has pursued agenda of increasing self-containment of these settlements (particularly Weston Super Mare), in reality more jobs have continued to be created in Bristol and in order to help alleviate transport issues Long Ashton should be recognised as a sustainable location for development.</p> <p>There is no hierarchy of settlements within the Green Belt</p> <p>Whilst there is a district-wide settlement hierarchy used to direct development allocations, we propose that a sustainability hierarchy specifically for settlements within and surrounded by the Green Belt should be established. This will help to ensure any development necessitating green Belt release will be allocated in the most sustainable way possible and address issues of transport and out-commuting discussed under point 2 above. This hierarchy should be based on NPPF definitions of Green Belt purpose and sustainability which will in turn recognise Long Ashton as the most sustainable settlement in (or surrounded by) the Green Belt for development.</p>	
Natalie Ward		<p>Green Belt land should not be sacrosanct – it is strangling Bristol and leap frogging into the countryside, risking the ethos and character of rural communities, the agricultural land and the AONB. Dormitory towns will be soulless and lack all the character that existing village life and communities are built around. Residents of these communities value the rural advantages, and did not move here to be followed by the urban sprawl that NSC is encouraging. There have been several other plans for development on green belt land, in North Somerset and also in other local authorities.</p>	
Natural England	Natural England	<p>While we recognise the role of Green Belt is not specifically related to the natural environment, given its extent and proximity to settlements we believe there is potential for it to provide a greater resource for people and wildlife. This might be something that is explored further through the WoE GI Plan and supported in Local Plan policies.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Newcombe Estates Company Limited	Boyer planning	<p>Promoting land at Portbury and Long Ashton in the Green Belt.</p> <p>Green Belt (Question 8)</p> <p>3.1 Section 5 of the Issues and Options Consultation considers the Green Belt and notes that around 40% of North Somerset falls within the Green Belt designation. It is noted that the council attach great importance to the Green Belt and no strategic changes to accommodate large scale housing proposals are being put forward in this Plan”.</p> <p>3.2 The importance and value of the Green Belt is understood, but the extent to which specific sites / locations contribute to the purposes of the Green Belt should be fully understood before a blanket restriction on Green Belt release is imposed.</p> <p>3.3 It is evident that the overriding influence behind the JSP spatial distribution of planned development is the objective to “retain the overall function of the Green Belt”. However, this has not prevented the JSP from releasing significant areas from within the Green Belt, based on exceptional circumstances related to the need to accommodate proposed growth. Such an approach is not applied to North Somerset, where the established resistance to consider appropriate Green Belt release remains.</p> <p>3.4 Page 15 of the Issues and Options document sets out the key issues related to Green Belt, but these are firmly set within the context of a general resistance Green Belt release. Potential solutions to these key issues are set out within the Issues and Options document and this includes the potential to consider Green Belt changes in locations identified as making only a limited contribution to the Green Belt purposes.</p> <p>3.5 Such an approach would be supported and should, in our view, represent the starting point for the identification of sites/locations for development. The location of a site within the Green Belt should not automatically exclude a site from further assessment. It is critical that the site identification process does not conflate Green Belt with considerations of sustainability. The location of a site within the Green Belt does not render a site unsustainable.</p> <p>3.6 A spatial strategy premised on the avoidance of the Green Belt may result is a strategy that would result in unsustainable patterns of development and could ultimately compromise the Plan’s objectives.</p> <p>3.7 It is evident, and accepted within the JSP, that the release of Green Belt is a necessary requirement of the Spatial Strategy. It therefore follows that where a significant uplift of the JSP housing requirement is deemed necessary, this will require additional sites located within the Green Belt to be released to ensure the Spatial Strategy responds positively to wider opportunities for development. This not only applies to Strategic Development Locations, but will also necessitate the release of Green Belt sites to accommodate the Local Plan nonstrategic allowance, where it is the case that the JSP strategic requirement is increased.</p> <p>3.8 It is noted that the North Somerset Strategic Housing Land Availability Assessment (SHLAA – 2018) confirms that the Part 1 assessment excludes those sites which are located entirely within the Green Belt. This is not based on any assessment as to the contribution such sites make to the purposes of the Green Belt.</p> <p>3.9 For the North Somerset to advance a spatial distribution strategy which has the retention of the existing Green Belt as the key consideration is considered to be a flawed process. The identification of sustainable development opportunities should, in the first instance, be distinct from Green Belt considerations. It is a logical and coherent process to consider development options on a “policy-off” basis, before policy constraints are applied, in order to provide a comprehensive and transparent assessment of site options.</p> <p>3.10 The exclusion of sites through the SHLAA Part 1 assessment based on their location within the Green Belt, fails to properly consider the extent to which such sites could deliver sustainable patterns of development. It imposes a blanket restriction on the consideration of such sites, and in doing so it pre-determines the overriding objective and spatial strategy of the North Somerset Local Plan, irrespective of the potential solutions presented within the Issues and Options consultation document.</p>	<p>209 NS Local Plan Issues and Options Boyer on behalf of The Newcombe Estates Company Limited.pdf (3.1 MB)</p> <p>209 NS Local Plan Issues and Options Boyer on behalf of The Newcombe Estates Company Limited1.pdf (3.1 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>3.11 The 2018 SHLAA states at para 3.11 that a site will be suitable “if it offers a suitable location for that use, is not subject to insurmountable constraints that cannot be mitigated, and would contribute to the creation of sustainable, mixed communities”. However, Part 1 of the SHLAA assessment comprises discounting all sites falling within the Green Belt, SSSI, Local Green Space, AONB, flood zone 3b, or greenfield sites with no boundaries adjoining an existing settlement boundary. Part 2 of the assessment then considers the remaining sites through a more detailed appraisal of their suitability, availability, and achievability, with each site categorised as either an existing housing allocation, a site that is ‘likely’ to have potential, one that is ‘less likely’ to have potential, or a site that is ‘unlikely’.</p> <p>3.12 Land at Portbury is identified in the SHLAA, of site reference HE18157. This site is located within the Green Belt and therefore the assumption in the SHLAA is that this site is unsuitable as a matter of principle. This site has therefore been discounted through the Part 1 assessment. Of the 2,678ha of land across North Somerset considered in the SHLAA, just over 60% has been ruled out through the Part 1 assessment, without any of these sites being taken forward to more detailed appraisal.</p> <p>3.13 Notwithstanding, the SHLAA acknowledges the difficulty in identifying sites to meet the dwelling requirement. The overall finding of the SHLAA is that “identifying sufficient suitable sites within North Somerset to meet the dwelling requirements emerging through the JSP is going to be extremely challenging and will require the consideration of a range of complex sites identified as having ‘less likely’ potential. Much of the dwelling provision is reliant on supporting infrastructure delivery”.</p> <p>3.14 It is stated within the Issues and Options consultation document (page 19) that no specific sites for new development are proposed at this stage. However, given the deliberate strategy of excluding Green Belt sites and therefore not subjecting such sites to a comparable assessments as to their sustainability credentials, the premise for the future spatial distribution of non-strategic growth within North Somerset is already confirmed. The consequence of which is that potentially sustainable and deliverable sites, are excluded because they are located within the Green Belt, without any assessment as to how such sites/locations contribute to the purposes of the Green Belt as defined in the National Planning Policy Framework.</p>	
Nigel Bennett (Magenta)	Magenta Planning	<p>We agree with the general issues and considerations raised by this section. In particular, the new Plan provides an opportunity for a wholesale review of settlement boundaries within Green Belt areas and consequently for communities within these areas to address their local housing needs. These should not be just minor changes to address anomalies but comprehensive reviews so that the revised boundaries are fit for purpose to accommodate the proportionate increased housing levels required and so that they will endure into the future. This will clearly be needed to address the serious challenges set by the JSP and consequently to deliver a sound and robust plan. This review should include the extent and appropriateness of washed over settlements within the Green Belt.</p>	
P Chedgy		<p>As I understand it, some 40% of the land in North Somerset is in the GB and, if not adjusted, the GB will operate seriously to restrict the expansion of Bristol. That the GB is not sacrosanct is illustrated by a number of necessary incursions, namely the Airport and the new South Bristol Link Road, to name but two, and all adjacent local authorities, including NSC, have acquiesced in this and/or have proposals for development on GB land.</p> <p>As I also understand it, notwithstanding that:</p> <ol style="list-style-type: none"> 1. only about 2% of NSC’s GB would be required to build 4,500 houses (and could be swapped for other land which could be converted to GB); 2. such houses would be much closer – i.e. by at least 10 -12 miles - to Bristol which would be the main source of employment for their inhabitants; and 3. this would significantly reduce car commuter use and so the adverse effect on both transport infrastructure and pollution <p>NSC is nevertheless seeking to commit to the leap-frogging of the GB and the creation of a substantial dormitory town on green field land that will both “suburbanise” a large area of agricultural land and run a serious risk of infilling the countryside presently forming important separations between small hamlets and villages but having no guarantee or, I would claim, likelihood of providing the infrastructure, including many amenities, that would be necessary to establish social cohesion and thus make it a desirable place in which to live.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Parish Councils Airport Association	Parish Councils Airport Association	Bristol Airport has consistently used permitted development regulations to achieve further development on the green belt beyond that granted by the planning consent of 2011. This can be seen by the addition of extra car parking and an aircraft stand. Permitted development regulations have also been used to relocate development that was granted consent on the north side of the airport, to the south side, in green belt. For example, application 18/P/3206/AIN - the administration block. We see no reason to remove greenbelt on and surrounding Bristol Airport. The removal of green belt will only exacerbate the problems highlighted of noise, surface transport, parking and further urbanise a rural area. The green belt allows tight control over airport activities.	
Pegasus (D Millward)	Pegasus Group	<p>The Case for Releasing the Land from the Green Belt</p> <p>3.7 The IOP specifically refers to the site as having the potential of being released from the Green Belt. This coincides with Bristol City Council also considering the release of Green Belt land in this location to meet some of their housing need that has not been met by the JSP.</p> <p>3.8 There is an opportunity to release this land through the preparation of both North Somerset's and Bristol's Local Plans.</p> <p>3.9 Furthermore, both Councils are considering releasing Green Belt land in this location because there is an acknowledgement that the land now performs poorly in Green Belt terms. This is reflected in the Green Belt review which was undertaken as part of the JSP process.</p> <p>3.10 The three cells now contained by the South Bristol Link Road (59b, 68b and 69e) were all rated as making a limited contribution to the key purposes of the Green Belt. To quote the Green Belt review, it states:</p> <p>"In these locations, covering a total of 122 hectares, the assessment has found that the cells are contained to some extent by surrounding development. The new transport infrastructure, which was under construction at the time of the assessment, has separated small areas of land from the wider countryside to the east. This was found to impact on whether the Green Belt boundary could endure beyond the</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>plan period because the construction of the MetroBus/South Bristol Link has created a more defensible boundary feature close to the urban area. The assessment notes that some parts of these cells, such as Bedminster Down, are open and visually prominent containing locally important open space, but that the cells had a limited contribution in terms of the purposes of Green Belt.”</p> <p>3.11 Furthermore, the delivery of homes in a sustainable location on the edge of Bristol will relieve the pressure on fundamentally less sustainable locations around the settlements unaffected by the JSP that may be located outside the Green Belt.</p> <p>Exceptional Circumstances</p> <p>3.12 The above sets out the key reasons as to why the Green Belt boundary should be extended up to the New South Bristol link Road. However, in order for the site to be released, exceptional circumstances will need to be demonstrated.</p> <p>3.13 Exceptional circumstances are likely to be found because the residual housing need left over from the JSP (whether 1,000 dwellings or higher) will not be deliverable exclusively at locations outside of the Green Belt.</p> <p>3.14 We consider this likely for the following reasons:</p> <ul style="list-style-type: none"> • As set out above, we consider the JSP housing target fails to take account of the full OAN for the West of England Authorities and the Inspector will require this shortfall to be addressed through additional allocations either through the JSP or the Local Plan process; <p>As also set out above, there are significant question marks over the deliverability of the SDLs within North Somerset. The Council will need to adopt a flexible approach to development in the early years of the</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>plan period to ensure a sufficient supply of housing sites are maintained. This will mean planning to deliver well above the 1,000-dwelling target identified in the JSP;</p> <ul style="list-style-type: none"> • The settlements associated with the SDLs will be unable to accommodate additional development which reduces the number of alternative sustainable locations outside of the Green Belt; • Other sustainable settlements (e.g. Portishead and Clevedon) are now heavily constrained by the Green Belt and would not be preferable in sustainability terms to sites on the edge of Bristol such as Land Off Colliters Way; • The IOP acknowledges that development at Weston-super-Mare will be focussed on maximising regeneration opportunities. Furthermore, the 'Urban Living' target to deliver 1,000 dwellings within the town is <i>in addition to</i> the 1,000 dwellings to be delivered on non-strategic sites. As such, the ability of Weston-super-Mare to contribute to this target is severely limited; • The strategy to allow small-scale Green Belt releases around the inset settlements would only be able to make a limited contribution to this target, particularly as such releases would only come to forward if there was local appetite for development. <p>Benefits</p> <p>3.15 Again, we would refer you to the promotional document which accompanies these representations as to the relative merits of the site in sustainability terms but the key headlines from the document are set out below:</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • Delivery of up to 400 dwellings (c. 275 within North Somerset's boundary); • Substantial gains for social infrastructure; • Highly sustainable location with good access to existing and future transport connections (e.g. Long Ashton Park and Ride, Metrobus M1 extension along the South Bristol Link Road etc); • Good access to facilities and services in the locality and the extensive services and facilities within Bristol City Centre; • Technical Transport, Heritage, Landscape, Ecological and Drainage work undertaken has revealed no significant constraints to development; • Deliverable promptly within short timescales due to the backing by major housebuilders. <p>Summary</p> <p>3.16 We consider that exceptional circumstances will be found to justify the site's removal from the Green Belt. The site makes a limited contribution to the Green Belt following delivery of the South Bristol Link Road.</p> <p>3.17 The development of the site will make a meaningful contribution to delivering the non-strategic growth required by the JSP and relieve pressure on less sustainable settlements outside of the Green Belt to deliver this requirement.</p> <p>3.18 The site is in a highly sustainable location with excellent access to public transport connections, services and facilities within Bristol and the wider area.</p> <p>4. SUMMARY</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>4.1 These representations have been prepared by Pegasus Group on behalf of Barratt Homes (Bristol) Ltd in response to the consultation on the North Somerset Council Issues and Options Plan.</p> <p>4.2 These representations have sought to respond to specific questions and/or issues raised within the document, specifically those which relate to Barratt Homes' interests in Land Off Colliters Way, Highridge, Bristol.</p> <p>4.3 The site, whilst located within the Green Belt, is now contained by the new South Bristol Link Road. There is, therefore an opportunity to adjust the Green Belt boundary in this location to follow the more logical and defensible boundary created by the new link road. This, in turn, would release land in a highly sustainable location capable of delivering a non-strategic level of development (c. 275 dwellings) that could contribute to meeting the residual housing requirement set out within the JSP.</p> <p>4.4 For the reasons set out within these representations we consider that the exceptional circumstances required to release the land from the Green Belt and, in turn, the site, alongside other land in this location, should be allocated for development.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>The last alteration to the Bristol and Bath Green Belt in North Somerset was the South West Avon Green Belt Local Plan adopted in December 1988. This was prepared in the context of the Avon Structure Plan and at the time the boundaries allowed for a sustainable amount of development between the built up areas and the defined Green Belt boundary, for example at Portishead. However those opportunities have now been developed and it is clearly appropriate to review Green Belt boundaries in North Somerset. However, we note that the Issues and Options document says no strategic changes are proposed to accommodate large scale housing proposals. The Local Plan 2036 is being prepared in the context of the JSP where in the other constituent authorities large scale strategic changes are proposed to Green Belt boundaries to accommodate development. Therefore the approach to the review of Green Belt in the JSP area is inconsistent and calls into question the approach and methodology. A different weight has been applied to the assessment in North Somerset compared to the other authorities and it is inconceivable that the evidence should demonstrate that there are <u>no</u> Green Belt opportunities in North Somerset.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>One issue with the JSP Green Belt assessment is how it defines cells for assessment and it generally relies on large cells to reject releasing any land. Cell 76a, south east of Portishead, is one such cell. It is assessed as assisting in preventing the merger of Portishead and Bristol Port generally due to the easterly extent of the cell. However, the area immediately adjoining the settlement makes a minimum contribution in landscape terms. This is recognised in the North Somerset Landscape Sensitivity Assessment (March 2018) which says <i>'land located between the Sheepway and the alignment of a former railway line is generally enclosed by strong boundary vegetation and has a sense of enclosure. Owing to this, this land is of low and medium sensitivity. If this land was developed, mitigation would be required close to the point at which the former railway line and the Sheepway join. This would reduce the visual prominence of land located further from the settlement edge.'</i> In addition, the existence of existing and proposed power lines in this location would also help to define an eastern extent of any development and the required safeguarding corridor would enable further mitigation planting to be provided.</p> <p>Therefore this provides the following options:</p> <ol style="list-style-type: none"> 1. Make a change to the Green Belt boundary to recognise this area only makes a limited contribution to Green Belt purposes; 2. Identify the land as safeguarded land, or 3. In the event of increased housing requirements allocate the land as a sustainable and deliverable urban extension to Portishead. <p>However there is another alternative strategy which arises from the section on Bristol Airport and Royal Portbury Dock on page 73 of the consultation document. This says in considering any opportunities to support business growth associated with the port it <i>'could include making allowances for additional land supply in and around Portishead to meet demand for high growth business including those linked to port activities.'</i> The implication is that this could include wider than port related business uses and as opportunities in Portishead are limited <i>'around Portishead'</i> will require changes to the Green Belt boundary, which for the optimum location of port related uses means between Portishead and the docks. We consider this opens the opportunity for further investigation for an employment-led mixed use development on this land comprising housing, a local centre and primary school together with potentially a new railway station, as set out in the response to question 4 on the land controlled by Persimmon Homes Severn Valley at south east Portishead.</p> <p>The implications of the proposals to expand Bristol Airport are also a key Green Belt issue. It is important that exceptional circumstances are properly identified to justify changes. The Issues and Options Document is currently unclear about this, noting that <i>'through the JSP, North Somerset Council recognises the existence of additional growth opportunities at the Airport but many detailed issues remain to be resolved.'</i> However this is not addressed in the JSP Publication Document and the only direct policy reference or enabling policy applies only to the SDLs. The Local Plan 2036 will need to be clear about how all changes to the Green Belt are to be assessed and justified on a consistent basis.</p> <p>Also, to enable any proposals to come forward on this Green Belt land will need an enabling policy in the JSP. NPPF136 says <i>'strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including Neighbourhood Plans.'</i></p> <p>Therefore we have suggested an amended Green Belt policy in the JSP which retains the principle of the Bristol and Bath Green Belt, but enables Local Plans to review Green Belt boundaries to meet other development land requirements in Local Plans in accordance with guidance in the framework for reviewing and establishing Green Belt boundaries.</p>	
Portishead Town Council	Portishead Town Council	<p>Agree with the key issues on the Issues & Options document, as numbered:</p> <ol style="list-style-type: none"> 1. Maintaining the importance and value of the Green Belt and preventing the sprawl of Bristol especially from large scale speculative housing proposals. 3. The implications of the proposed expansion of Bristol Airport in terms of factors such as noise, surface transport, parking, built development, and Green Belt changes. The potential for considering the future of land parcels in the Green Belt now contained by the South Bristol Link Road. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
Professor G R Pearson		<p>I believe changes do need to be made to the Green Belt, and many Local Authorities are using small parts of their Green Belt.</p> <p>Green Belt has already been used, for example, to construct the South Bristol Link Road, and airport. There is a suitable site on Green Belt, 2% of North Somerset's total, close to Bristol, with good transport links</p>	
R Smith	Walsingham Planning	<p>LVA welcome the recognition of the Green Belt as a key issue facing North Somerset and appreciates the importance and sensitivity of Green Belt policy. However, it is not made clear whether evidence prepared for the emerging JSP has informed the Consultation Document or whether NS Council proposes to prepare further evidence. For example, the Consultation Document refers to locations identified as making only a limited contribution to Green Belt purposes, but it is not clear whether these locations have already been identified and how.</p> <p>We are aware that a Stage 1 and 2 Green Belt Assessment was prepared to inform the emerging JSP. In response to consultation on the emerging JSP, LVA welcomed the decision to prepare a Green Belt Assessment and the decision to release land from the Green Belt to achieve the most appropriate spatial strategy. However, the way that this has informed the spatial strategy for North Somerset appears confused and ignores the potential for growth north of Nailsea.</p> <p>As part of earlier representations to the JSP Issues and Options paper a review of the JSP Green Belt Assessment Stage 1 was undertaken by The Environmental Dimensions Partnership (EDP) and submitted in support of LVA's representations. Based on this work it was clear that the JSP Green Belt Stage 1 Review only provided an initial strategic assessment of the Green Belt across the West of England plan area.</p> <p>To assist the JSP process, and in support of proposals to develop land North of Nailsea, detailed cell analysis was also provided by LVA in EDP's report which applied additional criteria in line with a more detailed, site-specific study against the cells defined in the JSP Assessment.</p> <p>Subsequently a Stage 2 assessment was prepared and added to the JSP evidence base. A further review of this latest evidence was undertaken by EDP and is attached at Appendix 2 for reference. This document also included a Non-Technical Summary of the earlier review of the WoE Stage 1 Green Belt Review undertaken by EDP.</p> <p>It is not clear whether NS Council intends to rely on the JSP Green Belt Assessments as part of its evidence base. However, it should be noted that EDP's review of the Stage 2 Green Belt Review disagrees with the findings in a number of specific areas and specifically in relation to the cell analysis relevant to land North of Nailsea as summarised below:</p> <ol style="list-style-type: none"> a. The JSP Stage 2 assessment and previous EDP assessment of the wider Stage 1 Cell 65, are in agreement that this sub-cell primarily serves Green Belt Purposes 2, 3 and 5. b. In terms of Green Belt Purpose 2, both assessments are in agreement that Sub-cell 65b makes a 'limited contribution' to preventing the merger of Nailsea and Sutton Edge Batch and Tickenham settlements to the north. c. There is a difference of judgement on the balance of positive and negative landscape characteristic attributes used to assess contribution to Green Belt Purpose 3 ("to assist in safeguarding the countryside from encroachment"). The JSP Stage 2 assessment concluded that the subcell would make a 'contribution' to the Green Belt in this respect, however, EDP has assessed that the sub-cell makes a 'limited contribution' due to the negative influence of the existing prominent urban edge of Nailsea. d. The Green Belt boundary to the north of Nailsea, is defined by the existing abrupt urban edge of the settlement which does not form permanent and natural feature boundary to the Green Belt. EDP therefore recommend that the boundary is amended and realigned to follow the Land Yeo watercourse which defines the northern boundary Sub-cell 65b. e. EDP recommends that the Green Belt boundary is redrawn further north of Nailsea where it would perform a more defensible function against the NPPF tests. <p>It is important to highlight that the Green Belt boundary around Nailsea has been reviewed at times since it was first established. As highlighted by the proposals map extracts at Appendix 3 land north of Nailsea was identified separately to the wider Green Belt. In addition land to the east of Nailsea was identified for release in the 1980's and as a result housing was constructed to allow the town to grow.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Overall, LVA consider that preparation of the Local Plan must be informed by a new and comprehensive review of the Green Belt against its fundamental aim and functions as set out in the NPPF. This is necessary to consider whether sites currently in the Green Belt such as the land in Nailsea, which have localised Town Council support, are in close proximity to the existing services, offer additional opportunities to provide a link road between 2 of the 3 major routes into Nailsea, link into to the current employment site and in turn reducing traffic through the town centre by 40%, include other localised infrastructure improvements and present the opportunity to expand on the adjoining existing employment land. Land such as land North of Nailsea should be allocated to address housing need and support employment growth and to identify locations making only a limited contribution to Green Belt purposes.</p>	
R Wood		<p>A review of Green Belt is definitely needed. Green belt should be protected. Further development should be closer to Bristol where there is at least some form of infrastructure with the new link road</p>	
Rocke Associates on behalf of Mactaggart and Mickel Homes Ltd	Rocke Associates	<p>The release of strategic development sites in the Green Belt in North Somerset is not foreshadowed in the JSP. As such, there is no locus for the Local Plan to consider allocating strategic sites in locations that are currently designated as Green Belt.</p> <p>It is therefore agreed that the Green Belt issues in North Somerset are limited to local adjustments to boundaries to permit small scale development only. The strategic allocations must conform with the JSP in accordance with the strategic priority to minimise adjustments to Green Belt boundaries by focusing future development on land outside the designation as far as possible.</p>	
Roger Key		<p>1. Formulation of The Emerging Plan</p> <p>1. Paragraph 136 of NPPF2 makes clear that Green belt boundaries should be altered through the preparation or updating of development plans. Since the first stages of development of the JSP, and now in the I&OD document, NSC has failed to conduct a review of its Green Belt boundaries, other than for the airport. NSC needs to conduct an evidence based review of the merits of allocating land for housing development within the Green Belt, particularly for sites located closer to the economic hub of the sub-region in Bristol, for which travel to work will require less travel and a greater proportion journeys can be made by sustainable modes. Failure to conduct this review is a serious flaw in the evidence base for both JSP and the I&OD and renders both documents unsound.</p>	
S Hibberd		<p><u><i>Responses to questions 5, 7 and 9</i></u></p> <p>The sacrifice of productive and high quality agricultural land to construct both roads and the planned development will damage the Rolling Yeo Valley Farmland landscape, encourage further rural sprawl along new roads, ruin the rural economy and the attractiveness of Mendip AONB to tourists as well as reducing the country's ability to feed itself just when we may be obliged to become more self-sufficient. The ecological and environmental damage to the countryside would be irreversible.</p> <p>It should be obvious that new homes need to be built close to sources of employment. That however would increase Bristol's economic influence. I suspect that fear of this result, rather than concern to maintain low grade Green Belt land at any cost, may explain North Somerset Council leaders' repeated rejection of the obvious alternative to the unsustainable proposal of Mendip Spring. That alternative is to allow 2% of NS's Green Belt land next to Bristol to be developed by Taylor Wimpey who own the land and have plans ready to go. The fields in question are not of high quality, some adjacent to the Park and Ride, and already include an industrial estate,</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>are crossed by a railway line and the new South Bristol Link road and Metrobus routes. It is not as if the Council refused car parking expansion at Bristol Airport or building of the link road, both on Green Belt land.</p> <p>The suggestion that settlement boundaries could be redrawn is very worrying. It is not clear where “new allocations” to encourage such redrawing will come from. The inclusion of the new SHLAA as part of the evidence base is disturbing. Is this meant to provide a blue print for further development? Will there be consultation on such proposals? Villages have their own identities and local loyalties. When they get too large that sense of community is lost. Already developers can be granted permission to build around 25 homes adjacent to village boundaries. Will redrawing of boundaries then extend villages ever outwards? The merging of villages should not be encouraged as the landscape character in and between villages needs to be preserved as indicated in NSC’s own guidelines.</p> <p>It seems strange to me that the expansion of Bristol Airport and much needed improvements to transport links have been excluded from this local plan. I realise it is the subject of separate consultation but it seems difficult to ignore the overlapping issues on infrastructure.</p>	
S Moore		<p>I disagree with the decision not to use the Local Plan 2036 (and JSP) as an opportunity to have a more ambitious and strategic conversation about the use of green belt land - particularly the land immediately to the south of Bristol close to the transport, employment and amenities there. Other local authorities in the area have included proposals to develop on their green belts (and to reallocate land) - why have North Somerset taken the decision that “no strategic changes to accommodate large scale housing proposals are being put forward in this Plan” (particularly given that 40% of land in North Somerset is green belt, and so much else is flood plain and AONB - yet over 10,000 additional new houses have to be built).</p> <p>If one of the stated purposes of the green belt is that of “safeguarding the countryside from encroachment” this purpose seems ill served by proposals to create “garden villages” on good agricultural land, in rural areas just outside of the belt. It would be better to build on some of the current green belt adjacent to Bristol, and to reallocate this to land that is genuine countryside, and which doesn’t have good transport links or employment prospects.</p> <p>I therefore fully support the inclusion of Question 4 - to consider the future of land parcels in the Green Belt now contained by the South Bristol Link Road. Using just 2% of current green belt could provide for 4,500 houses, with this green belt being reallocated to more genuinely “green” locations. This would make a lot more sense than continuing to protect land that is next to Bristol and now contained between the road, car parks and industrial/employment sites. Land that, in the words of this plan, is “making only a limited contribution to Green Belt purposes”. My question is why this land hasn’t already been included in both the JSP proposals and the Local Plan 2036 as a strategic development location. I believe it should be included as a proposed site, not just as a question to consider.</p>	
SCT1967		<p>If the maintenance of green belt is a priority, why is this being waived for airport expansion? The plan for massive housing development in Churchill and Banwell is merely a trade off for funding to secure additional road infrastructure from the M5 to Bristol Airport. These huge proposed developments are quite simply, in the wrong place. Preventing the 'sprawl' of Bristol is not an argument against building on green belt on the fringes of the city. The city is where the employment is, where services are, where transport hubs exist, basically WHERE PEOPLE WANT TO LIVE, WORK AND RAISE THEIR FAMILIES. The closer to these things people live the greater the opportunities for a more sustainable living eg cycling & walking to work, use of public transport etc. as cited as ambitions for modern sustainable living. Creating large developments outside of major urban areas merely causes huge traffic problems as people attempt to travel into the city. More affordable housing should be built on the fringes of the city and on brownfield sites in and around the city.</p>	
Simon		<p>That some 40% of North Somerset is green belt represents a major challenge to the JSP and should not be taken as a constraint. Green belt was an excellent idea to establish sensitive planning in the era that it was introduced. At that time, most people did not have cars and had to rely on walking, cycling or public transport to access recreational areas outside towns and cities. Nowadays the majority have cars and can reach countryside much further afield. The non green belt areas of North Somerset are just such areas that they do access. Building in the green belt would not reduce such access.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Much of the demand for housing in the broad area of the JSP is needed for Bristol. Releasing some green belt land in the North of North Somerset would serve both Weston-super-Mare <i>and</i> Bristol, whereas the current plans for 'garden villages' -- or 'towns' as a more reasonable use of English would demand -- provide housing much further from Bristol promising longer more congested commutes for those working in Bristol.</p> <p>However, rather than ask central government to think about the effects of green belt in the 21st century, the JSP has taken green belt as a given. Had it done otherwise, a more sensitive and better plan for the region might have been found and being considered now. I accept that such a plan would have been just as controversial but it might well have been more rational, more sustainable and better suited to the needs and development of the region.</p>	
Simon		<p>My main concern at this stage is that this consultation is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors. This consultation makes assumptions about the number and location of additional housing, the sanctity of the green belt and new roads that are being challenged by very many respondents to earlier consultation and brought to the attention of the ongoing examination by the Inspectors.</p>	
Simon Hegarty		<ol style="list-style-type: none"> 1. The Green Belt's original intention was to prevent urban sprawl. Illogically, to persist with NSC's application of Green Belt policy results in proposals such as the Mendip Spring Garden Village, a substantial 2,880 house town to be constructed in pristine countryside 15 miles from Bristol the key source of employment.. This is tantamount to 'leapfrog' urban sprawl but in a wholly rural location alongside an AONB with significant supporting infrastructure costs and substantially greater environmental, ecological and landscape damage. 2. The Green Belt policy requires updating or interpreting in favour of development in locations close to jobs and well serviced by public transport. There is no evidence of any Green Belt re-assessment being considered by North Somerset Council. 3. The other three adjacent Local Authorities in the JSP have decided to release Green Belt for development. 4. The Green Belt is not sacrosanct, even in North Somerset: <ul style="list-style-type: none"> • The new South Bristol Link road cuts across NSC Green Belt • Bristol Airport is on Green Belt • Bristol Airport has just been granted planning permission (October 2018) by North Somerset Council to extend the Silver Zone car park on the Green Belt. 6. The Green Belt immediately south of Bristol: <ul style="list-style-type: none"> • Is not good agricultural land • Is not used for recreation by residents • Has a refuse dump • Has an industrial park. 7. 40% of land in North Somerset is Green Belt. An alternative proposed development in Ashton Vale of 4,500 houses close to Bristol amounts to 2% of the Green Belt. 8. Green Belt could be reallocated eg to areas proximate to the Mendip Hills AONB. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
SJH2017		Removal of the valley to the north of Nailsea from green belt is an undesirable option. It would be preferable to continue to develop existing areas with better transport access, such as the Ashton Vale area and areas closer to Bristol Airport (which may in future benefit from a new Metro link) and Nailsea & Backwell station.	
SR		We are opposed to developing on the Green Belt land north of Nailsea. This is a site of huge importance for nature, residents and future generations for this area. We fully support North Somerset Council's policy to maintain the Green Belt north of Nailsea.	
Stokes Morgan Planning Ltd	Stokes Morgan Planning Ltd	Q5. We would advocate an approach that seeks to release accessible, well-connected non-strategic sites from the Green Belt.	207_NSC_LP_Response Newlyn FINAL.pdf (530 KB)
Stowey Sutton Parish Council		<p>Stowey Sutton Parish Council (SSPC) supports the response to this consultation from The Parish Councils Airport Association (PCAA) of which it is a member.</p> <p>SSPC believe that this consultation is premature due to (i) the West of England Joint Spatial Plan (JTP) having to hold a further consultation regarding the Habitats Regulations Assessment (HRA), and a Sustainability Appraisal (SA); (ii) the examination in public on the JSP is not being held until at least May 2019. And (iii) the JSP is to be the hierarchy document with which the NS Local Plan is expected to conform. It is expected that some changes in the JSP will be made.</p> <p>This document shows that the main aim of the Local Plan to 2036 does not deliver</p> <p>sustainable development which meets the needs of the present without compromising the ability of future generations to meet their own needs. SSPC believes that any further expansion of Bristol Airport undermines four of the five objectives and we would argue strongly that Bristol Airport already meets people's needs and helps the economy thrive. The objectives are to:</p> <ul style="list-style-type: none"> • Support communities that meet people's needs • Improve health, safety and wellbeing of all • Develop a diverse and thriving economy that meets people's needs • Minimise consumption of natural resources • Maintain and improve environmental quality and assets <p>Bristol Airport has consistently used permitted development regulations to achieve further development on the green belt beyond that granted by the planning consent of 2011. This can be seen by the addition of extra car parking and an aircraft stand. Permitted development regulations have also been used to relocate development that was granted consent on the north side of the airport, to the south side, in green belt. For example, application 18/P/3206/AIN - the administration block. We see no reason to remove greenbelt on and surrounding Bristol Airport. The removal of green belt will only exacerbate the problems highlighted of noise, surface transport, parking and further urbanise a rural area. The green belt allows tight control over airport activities.</p>	
Taylor Wimpey - The Vale		<p>1.4. We object to the current consideration of matters associated to Green Belt for a number of reasons.</p> <p>1.5. Firstly, at this Issues and Options stage of the plan making process, NSC should not and cannot soundly reach the conclusion that there is no need to revise Green Belt boundaries to accommodate large scale housing, not least because of:</p> <p>i. the significant uncertainty around the JSP's housing target (and the apportioned share of this for NSC), the choice and soundness of proposed SDLs and the draft JSP's recognition that exceptional circumstances warranting the amendment of Green Belt boundaries do exist within the plan area; and</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>ii. the consultation document’s acknowledgement that Green Belt policy has been in place since the early 1950s and that the Local Plan affords an opportunity to consider whether its boundaries are “fit for purpose in the long-term”, with no consideration as to whether retaining Green Belt in its current form is compatible with the objective of promoting sustainable patterns of development; and</p> <p>iii. the consultation document’s suggestion that there will be revisions to the Green Belt to accommodate small scale residential development.</p> <p>1.6. Secondly, there is no need or justification to list “preventing the sprawl of Bristol especially from large scale speculative housing proposals” as a key issue facing the Local Plan. Specific reference to Bristol starts to incorrectly introduce a hierarchy of importance for areas of Green Belt protection regardless of how important land is for fulfilling the purposes of Green Belt, as defined by national policy.</p> <p>1.7. Furthermore, national policy does permit what could be termed “speculative” development in the Green Belt in “very special circumstances”; therefore it is not in the gift of NSC to redefine this within the emerging Local Plan. Accordingly, this sentence should be removed.</p> <p>1.8. Thirdly, through the current wording of the consultation document, there is implicit support for the release of Green Belt land at Bristol Airport to meet employment needs, but explicit objection to amendment of Green Belt boundaries for housing. There is no justification or evidence for why there should be differing approaches for residential and employment purposes.</p> <p>1.9. To be clear, TW have no objection to amendment of Green Belt boundaries at Bristol Airport, however, any amendments should be the product of an evidence-based and justified application of Green Belt policy.</p> <p>1.10. Aside of the points made above, and given the identification of exceptional circumstances through the JSP, we support NSC’s proposed release of Green Belt land (to the east of the South Bristol Link Road) which clearly makes a limited contribution to Green Belt purposes.</p> <p>1.11. This approach to considering revisions to the Green Belt in areas which no longer make an important contribution to the Green Belt should be applied across NSC via a comprehensive and objective Green Belt review, to aid consideration of the most sustainable locations for development.</p>	
The Belmont Estate	Ridge and Partner LLP	<p>Key Issue 2 queries whether there should there be more opportunity for communities within the Green Belt to address their local housing and other needs. In this regard, the Estate is keen to highlight that it is looking to expand its rural business activities and tourist accommodation offer. However, due to the Green Belt confines this is restricting the options available to the Estate. The Estate is keen to discuss this further with Officers and to explore opportunities for expansion at the Estate as noted earlier through more flexible policies regarding rural tourism and business opportunities that would enable, for example, the estate to benefit from a review of DM57 (Q 50) particularly in conjunction with support for Q 50.</p>	
Tom Leimdorfer		<p>Support revision of the Green Belt to allow sustainable development with 35% affordable housing close to the South Bristol Link. This could provide around 3,000 new dwellings close to existing infrastructure and employment.</p>	
Tom Rawlins		<p>We note that 40% of land in North Somerset is Green Belt and that Just 2% is needed to build 4,500 houses close to the jobs in Bristol. This could be reallocated to the area surrounding the Mendip Hill AONB in order to protect it for future generations to enjoy its tranquility including the views from it which are protected by the Countryside and Rights of Way Act 2000.</p> <p>The Green Belt is strangling Bristol. It is not sacrosanct/untouchable. It can be changed in ‘Exceptional circumstances’. We believe that the need for 25,000 houses to be built in North Somerset relating to jobs in Bristol constitutes ‘Exceptional Circumstances’.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The new South Bristol Link road has been built on Green Belt. Bristol airport is on Green Belt and yet can expand seemingly freely into Green Belt land. Why is NSC even considering ruining the countryside adjacent to the Mendip Hills AONB rather than build on 2% of North Somerset's Green Belt NSC?</p> <p>We agree with CALRAG's statement that North Somerset Council is encouraging urban sprawl to leap-frog over Green Belt to create a soulless, dormitory town on good agricultural land. Furthermore, all the adjacent Local Authorities have proposals for development on green belt.</p>	
Vence LLP		<p>We write on behalf of Vence LLP to make representations to the Local Plan 2036 Issues and Options Document (September 2018) prepared by North Somerset Council. In particular, this letter makes specific comment on the proposed Plan with respect to its impact and relevance to the land north of Metrobus at Ashton Vale, which is currently being discussed with the officers in both Bristol City Council (BCC) and North Somerset Council (NSC) as a potential development site for c. 500 residential dwellings.</p> <p>The representations that follow, outline a broad degree of support for the direction of the issues and options document, offering comment largely in respect of how the more detailed policy to follow at a later plan preparation stage might make the most of opportunities.</p> <p>Chapter 2; Section 5 – Green Belt</p> <p>We note NSC's stance that no Green Belt will be released to support strategic housing allocations. Vence LLP offer no view on this nor on the effect it may have on the Council ability to meet its objectively assessed needs. We do note, with interest however, point 4. on page 15 and the fifth bullet point on the same page, which, respectively, read as follows:</p> <p>"4. The potential for considering the future of land parcels in the Green Belt now contained by the South Bristol Link Road."</p> <p>And</p> <p>"Consider local Green Belt changes in locations identified as making only a limited contribution to Green Belt purposes. This include consideration of the land inside the South Bristol Link in conjunction with Bristol City."</p> <p>The first point identifies a key issue and the latter a means to address it. Vence LLP fully support the Council in this matter and with specific respect to the land north of metrobus in Ashton Vale. BCC's Local Plan Review February 2018 identified the land north of metrobus as both having the potential for development and the potential for release from Green Belt (policy CDS10). This site offers the Joint Spatial Plan area the opportunity to deliver c. 500 dwellings and BCC have identified in principle support for it in their latest Local Plan review document. To facilitate this growth, as is known to officers with NSC, there is a need to provide access into and out of the site via the existing infrastructure around the Long Ashton Park and Ride (B3128) , within NSC Local Authority area. For a plan to be found sound at Examination, there is a duty on the Local Planning Authority to demonstrate co-operation with neighbouring authorities. This matter is therefore vital to the soundness of the NSC Local Plan. If BCC is to propose the release of Green Belt in this location to deliver their housing target, NSC should also release it from Green Belt.</p> <p>This is entirely in accordance with the options identified in Chapter 2; Section 5 of your draft Local Plan. It will facilitate growth around the South Bristol Link Road and requires the removal of land which now, due to the metrobus road network creating new defensible boundaries is entirely on land which can be considered to make a low contribution to the purpose of Green Belt. This is as evidenced by the Stage 2 Green Belt Assessment (November 2016) prepared in support of the Joint Spatial Plan, which found the land north of metrobus to make limited contribution to the purpose of Green Belt (cell 96e). The land within NSC between the park and ride and cell 96e was not formally assessed, but in any case, contains existing urbanising features which, as noted by the Green Belt appraisal for cell 96d, limits the lands ability to prevent encroachment into the countryside.</p> <p>Furthermore, its release would have no impact on the green buffer being maintained between Bristol and Long Ashton. As the land in question, within NSC, would be used to facilitate roads/access routes only, its impact on the landscape sensitivity, identified by the Landscape Sensitivity Assessment Addendum Report (August 2018) as being of high sensitivity, would be minimal, particularly when considering its location between the existing park and ride and the David Lloyds Sports Centre (also considered a landscape of high</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		sensitivity). We would request that the Addendum report considers this location and its particular existing landscape quality in further detail as the high level of sensitivity does not appear to relate to the current urban context, in this respect a more detailed sub-area breakdown may be required to achieve a more robust appraisal.	
Viv Tomkinson	Congresbury Residents Association Group	The document includes the suggestion that consideration could be given to making changes to the Green Belt land inside the South Bristol Link Raod. I completely endorse this suggestion. NSC's complete refusal to consider changes to the Green Belt has completely handicapped the development of the JSP and this stage in the development of the Local Plan. The land south of Bristol needs to be released from the Green Belt. It is a sustainable location for the major housing development target to be achieved by NSC and will provide homes where they are needed - close to good transport links, employment and amenities. You must not sacrifice good agricultural land rather than use urbanised green belt land	
WENP	West of England Nature Partnership	We welcome the recognition of the impact on development on the Green Belt, which is important in place-shaping. We would strongly support similar protections – perhaps in a designated chapter – for a multi-functional strategic green infrastructure network, which would safeguard key ecological corridors and associated biodiversity as well as opening up more opportunities for active travel and recreation, supporting with flood management, improving water quality and helping filter polluted air and sequester carbon.	
Wraxall	Mrs	North Somerset has dismissed the areas north east of Nailsea (which is actually Wraxall) as unsuitable for development and has not proposed to interfere with our Green Belt and allow release of this land for development. Please maintain this stance. Given the suitability of other sites for development, there would seem to be absolutely not need for this Green Belt area to disappear. Nailsea Town Council would like to see the destruction of this Green Belt area. Once gone, it will have disappeared forever, depriving local residents of much valued green space for recreational and social purposes - an area which fulfils one of the important criteria of Green Belt which is to prevent sprawl from the towns in to the countryside. We are unique in this country for protecting our countryside in this fashion - any interference is surely the thin end of the wedge an would erode the unique nature of our environment. The area to the north east of Nailsea is of significant importance, too, in protecting local biodiversity and wildlife - it links directly to the SSSI in Tickenham - a corridor which we must protect at all costs. IT is a flood plain and given the disastrous floods we have seen in Somerset over recent years, any hint of building on an area which is prone to flooding is surely nonsensical. Please, North Somerset, do not consider any change in the Green Belt to the North of Nailsea	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	<p>The key issues in this section are agreed. The Core Strategy and its supporting policies have served the communities within the Green Belt well and W&F PC believes that there is no need to change them.</p> <p>W&F PC strongly opposes the removal of land to the north and east of Nailsea from the Green Belt for the following reasons:</p> <p>Exceptional circumstances do not exist to warrant a review of this Green Belt.</p> <p>The Green Belt Assessment in the JSP shows the land as 'contributing'. So not only is it Green Belt, but it is in roughly the top 20% of significant Green Belt.</p> <p>It is a sensitive landscape and we support North Somerset Council's view as stated in the JSP supplementary documents that the expansion of Nailsea into it should be avoided. The Green Belt acts to safeguard the countryside from encroachment. The site acts as a clear distinction between town and country.</p> <p>The land is low lying and flood risk affects part of it, while other parts abut the flood plain. Heavy rain causes the river to swell and for floodwater to settle on the land. With climate change accelerating we can expect flood zones to increase in size.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Development will increase run off into the river and increase flooding. Increased run off into the river is likely to cause pollution that will affect local businesses such as the trout farm at Jacklands and the SSSI on the other side of the B3130 at Tickenham that is fed by the river.</p> <p>W&F PC believes that any development that increases the flood risk would not be sustainable development.</p> <p>Any development would add an extra burden onto the B3130, B3128 and Wraxall Hill. The detrimental impact on the rural road network is addressed further within this response. We believe that residents on this proposed development would mainly commute into Bristol rather than work in Nailsea.</p> <p>The land is archeologically sensitive, with Roman and medieval archaeology existing.</p> <p>An oil pipeline travels through the land.</p> <p>The land is a green corridor for wildlife and a wildlife habitat.</p> <p>W&F PC supports the views expressed in the Parish Council's Airport Association submission against further expansion of Bristol Airport.</p> <p>W&F PC believes that development in the land parcels in the Green Belt now contained by the SBL is a more sustainable approach, as this will reduce commuting distances and the impact on an already stretched transport network, given that economic development and employment for the northern and eastern part of North Somerset is likely to be in or around Bristol.</p>	
Wrighton Parish Council	Wrighton Parish Council	Green Belt is greatly valued by residents, not only for its 'strategic gap' value but also as a constraint on planning and development and should not be depleted. It has a strong visual amenity value and changes should be resolutely opposed (including Bristol Airport). Where Green Belt land is however low value and largely derelict, it may be appropriate to sacrifice it for the greater benefit to the community and the environment.	
Wrighton Village Alliance		Green Belt - We disagree with the emotive words " <i>preventing the sprawl of Bristol especially from large scale speculative housing proposals.</i> " . We consider an issue that should be addressed is how existing Green Belt land to the immediate south of Bristol could be developed sensitively and sustainably to respond for the demand for housing in the regional employment centre. Changes to Green Belt here may need to be more than " <i>minor</i> " and this qualification to a Bristol Green Belt review to the immediate south of Bristol should be removed.	
wwarden		In section 7 below, which refers to Bristol Airport, there is suggestion of revisions to the Green Belt boundaries. It seems to me that rather than resisting this elsewhere in relation to housing development, it would be far more sensible to accept major or strategic housing development close to Bristol. This has been proposed by developers and, I suspect, will be agreed at some point in the future. Therefore, I suggest that a more realistic approach is accepted at this stage and this Green Belt development is included in the Local Plan, with at least the 'Mendip Springs' proposal removed as well as most of the Banwell scheme.	

Document Part Name Q6. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alder King (M Cullen)		Q.6 (Central Parishes) Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>5.1 The second part of the representations provides responses to the relevant consultation questions in section 2 and 3 of the 'Issues and Options' consultation document.</p> <p>5.2 In terms of the North Somerset wide issues, the summary of key issues and suggested ways to address them through the Local Plan are supported. The University of Bristol's land at Wyndhurst Farm (see redline plan at Appendix 2) could play a role in supporting two of the suggested initiatives and these are set out and then discussed in more detail below:</p> <p>? Identify policies and allocations to deliver the housing requirement at sustainable locations; and</p> <p>? Consider policies and allocations to support economic growth.</p> <p>5.3 The University of Bristol's land is available and would be suitable for housing or employment development</p>	
Alex		Some important issues. But wait for the funding for the infrastructure first.	
Andrew		<p>The JSP consultation needs to be concluded before this consultation. The proposals for housing and roads at Banwell and Churchill are wholly inconsistent with the objectives of the JSP in that they fundamentally damage the landscape and are unsustainable, giving rise to damage to the rural setting, the value of the AONB, and will create huge traffic volumes across the district and into and out of Bristol.</p> <p>Whats more the term Garden Village is misleading - the proposed Churchill and Banwell housing developments are huge housing estates and should be referred to as such.</p> <p>The proposed housing estates at Banwell and Churchill will give rise to a huge volume of car journeys into and out of Bristol as there are too few employment opportunities existing or proposed within the plan.</p> <p>Historic hamlets, such as Brinsea and Honeyhall will be destroyed by the Churchill housing estate. The existing villages will loose all sense of charchter and separation, and the district will become a suburban sprawl with token bands of separation of low amenity value.</p>	
Aston	Aston and Co UK	<p>The viability of the proposed garden villages (Banwell and Churchill) has yet to be demonstrated, or examined under the JSP examination. These locations are not sustainable, will require huge infrastructure investment the implementation of which will create significant environmental effects.</p> <p>This cannot be the most sustainable solution. The Green Belt restrictions are out of date and creating perverse outcomes.</p>	
Avon Wildlife Trust	Avon Wildlife Trust	<p>We strongly agree that the environmental implications of development on internationally protected habitats and floodplain areas is a key issue. Given the sensitivities of these it is difficult to see how the proposed quantum of development can be delivered in these areas without significant negative effects.</p> <p>Many of the waterbodies in North Somerset are failing to achieve the environmental targets set for them in the Water Framework Directive. It is vital that any new development does not have an adverse impact on the surrounding waterbodies WFD status.</p>	
B Moss		Zero-carbon developments are essential in the next 12 years	

Respondent Name	Respondent Organisation	Comment	Attached documents
Banwell Parish Council	Banwell Parish Council	<p>Point 1 is a key issue for the Parish Council. The alignment of the proposed Banwell Bypass/Sandford and Churchill Bypass needs detailed investigation. In particular the potential traffic flows of the selected routes and the proposed alternative link between the two (and any other road proposals that may be identified as a result of this consultation). There is concern that the Dark Lane slip road would invite the growing number of commuters from Winscombe and beyond to use this route and the centre of Banwell as a 'rat run' to the Weston and the motorway unless alternative traffic management is in place for the surrounding roads.</p> <p>Point 4 should be clarified by deleting 'further' and inserting 'Accommodating the'. The Local Plan is intended to set out how the LP will accommodate the growth in NS that may result from the adopted JSP- 'further' suggests there is more to come. The second sentence should also be expanded to include ensuring that the proposed highway works, and residential/employment development does not adversely affect the amenities and living conditions of the existing population as well as improving and protecting the character and environment of existing villages.</p> <p>Point 6 should identify the need to provide for and improve education and social facilities for the growing population in the central parishes</p> <p>Point 7 should not refer specifically to Thatcher's but instead should just identify the need to support the improvement of local employment opportunities to help sustain residential growth.</p> <p>The second bullet point should refer to 'sustainable development at non-strategic locations', as development at the strategic development locations is catered for in the first bullet point.</p> <p>The third and fourth bullet points –delete 'Consider' and insert 'Identify'.</p> <p>The fourth bullet point should provide for the consideration and allocation of adequate education and community facilities throughout the central parishes that may become necessary as a result of the development of the strategic development locations</p>	
Blagdon PC	Blagdon Parish Council	<p>Blagdon Parish Council (BPC) considers that the major issues are all included.</p> <p>We are concerned that the master planning and delivery aims of the Local Plan will be overtaken or heavily influenced by the JSP and JTS. We believe that the variety of villages of differing sizes and characters should have greater recognition in the Local Plan.</p>	
Bridget Petty		I do not support the garden Village proposals at Banwell and Churchill, i think this is the wrong location for largescale development. I think closer to Bristol, Ashton Vale would be more appropriate.	
Burrington Parish Council	Burrington Parish Council	The local plan has not begun to consider the form and location of the Garden Village proposal at Churchill in any meaningful way. The diagrams show no practical understanding of the options for strategic road access, how the SDL would connect to the bypass, or its internal distributor roads, including links with Churchill and Langford and existing local roads. Churchill Green is a major constraint on routes between the proposed bypass and the Churchill Gate junction (A368/A38) and the arrow diagrams do not acknowledge that fact.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Christopher Day		I do NOT agree that a key issue is 'the form, delivery, design etc of the proposed garden villages in Banwell and Churchill' A key issue should be to establish why this proposal is given so much preference in the Local Plan.	
Cleeve Parish Council	Cleeve Parish Council	<p>The garden village proposed at Churchill will increase traffic congestion on the A370 particularly through our village of Cleeve. The additional houses which are being constructed now in Yatton will also increase traffic congestion on the A370 through our village. Currently the housing developments appear not to be developed in sustainable locations.</p> <p>CPC support a secondary school in Yatton, it would give more choices of schools in the area.</p>	
Coln Residential (DLP Planning)		<p>These representations have been submitted on behalf of Coln Residential in response to the North Somerset New Local Plan 2036 Issues and Options consultation (NLP). This document sets out Coln Residential's response to the emerging NLP and the associated evidence base and supports the promotion of land that Coln Residential has interests in at Land at Dinghurst Road, Churchill.</p> <p>Background The four West of England Authorities are working together to produce a West of England Joint Spatial Plan (JSP). The JSP will identify the needs for housing, employment and key infrastructure from 2016 – 2036 and the broad strategy for its delivery. The JSP was submitted for Examination in April 2018 and the additional technical evidence work is currently undergoing public consultation until the 7th January 2019.</p> <p>The current Local Plan for North Somerset covers the period to 2026. The NLP is being produced in order to provide detailed guidance to deliver the growth planned for in the JSP and will cover the period to 2036 in line with the JSP.</p> <p>Coln Residential welcome the preparation of the North Somerset New Local Plan. Coln Residential have previously submitted Land at Dinghurst Road, Churchill to North Somerset Council through the Call For Sites process that took place in January – February 2017.</p> <p>These representations have been split into four sections:</p> <ul style="list-style-type: none"> • Section 2 provides a response to the overall NLP Issues and Options Consultation document; • Section 3 provides a response to the Evidence Base for the NLP; • Section 4 sets out the advantages of Land at Dinghurst Road as an allocation in the NLP; and • Section 5 sets out the main conclusions of these representations. <p>RESPONSE TO THE OVERALL PLAN Coln Residential welcome the preparation of the NLP and broadly agree with the main issues presented in the Issues and Options document. However, discussed below are those elements of the NLPIO that Coln Residential wish to provide comment on.</p> <p>Q6. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?</p> <p>Coln Residential are broadly in agreement with the issues identified for the Central Parishes in the NLP Issues and Options document. Coln Residential support the identification of policies and allocations to deliver the housing requirement at sustainable locations, such as Churchill.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Congresbury Parish Council	Congresbury Parish Council	<p>The consultation has not identified traffic issues through</p> <p>Congresbury which is worse than the mentioned issues in Yatton. Longer term strategic infrastructure improvements are required along the A370 and routes linking the A roads to the M5.</p> <p>The identification of flooding is an important issue but disappointed that these issues do seem to have been mentioned in the section about items being identified as being addressed in the local plan.</p> <p>We also question whether there is the need for Garden Village proposals at Banwell and Churchill, if the Greenbelt area was readdressed. We will cover this later in the response.</p>	
CPRE Avonside	CPRE Avonside, North Somerset District	<p>The consultation recognises the key issues for the central parishes' in that they contain internationally protected habitats and floodplain area. Protecting the individual character and environment of existing villages would be impossible given the volume of development proposed. There are no policies capable of addressing the issues of these proposals.</p>	
Cresten		<p>The major challenge overall is radically slowing climate change, which will reach emergency level by 2036 if not tackled now. The Council prioritising building genuinely affordable high-density housing built to high energy efficiency standards in genuinely sustainable locations with good access to green space and community hubs, a major tree-planting campaign, and backing provision for electric vehicles and renewable sources of energy would be a start. Rising health and social care costs would reduce if air pollution, poor living standards, and people's need for community were addressed. North Somerset's USP in attracting businesses and individuals is countryside and coast. The countryside in particular is being trashed by ill-planned commuter dormitory estates, which block the potential for green infrastructure corridors to the coast, and leisure and tourism opportunities.</p>	
Ecomotive Ltd		<p>Of particular interest here is the opportunity presented by the proposed New Garden Villages at Churchill and Banwell. These will provide a rare and exciting possibility for both existing and new community members to take leadership in decision making about their new homes and neighbourhoods, and to take on ownership of vital community assets such as land, housing, community venues and employment infrastructure.</p> <p>The experience of other European countries, particularly Germany, shows that when CLH groups of various kinds are given specific allocations of land within larger scale new developments, these groups take on an essential role in community-building, both through the close engagement of project leaders and future residents in the whole process and through bringing excellence and innovation in design. Politicians and local administrations in these areas recognise the benefits that these groups bring in 'stabilising' the new communities, taking on core roles in community building and establishing vibrancy from the start. In our view, the opportunity of including community-led development as a core component within these schemes is too valuable to miss. Community leadership and ownership should be planned in from the start, through early conversations with existing community bodies, invitations to new groups that may be interested, and enabling developers/housing associations that are willing and able to work in partnership with communities in a way that puts them in the driving seat. We also refer to our response to Q5, with regard to supporting sustainable rural livelihoods. This is also of direct relevance to the Central Parishes, and indeed across the entire rural area of the district.</p>	<p>North Somerset Local Plan - submission by Community Led Housing West December 2018.pdf (171 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		(see table in attachment)	
FCC Environment Ltd	Sirius Group	<p>Chapter 6 of the Issues and Options Document is in relation to employment. FCC support the statement on page 70 that "The Local Plan will provide a clear economic vision and strategy to encourage sustainable economic growth, and will recognise and plan for the requirements of different economic sectors functioning across North Somerset, particularly those considered to be key sectors with an important role within the existing and future North Somerset economy". However, it is noted that there is no reference to the rural economy within the Issues and Options Document. FCC consider this is not in accordance with the NPPF and the plan should consider the vitality and economy of rural areas needed for rural communities to boost rural economic growth. Paragraph 3.16 in the Sustainability Appraisal Scoping Report states that "tourism, whether day visitors or staying visitors forms a significant part of the North Somerset economy. The GVA of tourism is estimated at £375.3 million...". In addition, the Economic Impact of North Somerset's Visitor Economy 2016 states that the number of people employed full time directly and indirectly by tourism in North Somerset is estimated as 5,032 full time equivalents.</p> <p>Paragraph 83 of the NPPF which states that "planning policies and decisions should enable:</p> <ul style="list-style-type: none"> • a) The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; • b) The development and diversification of agricultural and other land-based rural businesses; <p>1. c) Sustainable rural tourism and leisure developments which respect the character of the countryside...".</p> <p>Paragraph 84 goes onto state that "planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport...". It is considered that the Issues and Options document does not give sufficient regard to this important sector and is therefore not in accordance with the NPPF. The plan should present issues and options in relation to this "significant part of the North Somerset economy" and consider ways in which the rural economy and tourism can be enhanced and supported.</p> <p>Page 70 goes on to state that "policies to guide business development and the allocation of land will seek to maximise opportunities to support growth in sectors including financial and professional, high vale manufacturing and design, food and drink, digital technology, media and telecoms and cultural and creative industries". FCC consider that tourism should be added to this list of sectors.</p> <p>It is noted that there is no reference to tourism within the Issues and Options Document, apart from in relation to transporting tourists. FCC consider this is not in accordance with the NPPF which advocates that a proactive approach should be taken within policies and decision making and thus the New Local Plan should include tourism policies that actively support and encourage this form of development. The plan should consider the vitality and economy of rural areas including tourism developments needed for rural communities to boost rural economic growth.</p>	
Hayes Family and Mr Cope		We agree with the key issues set out and how these can be addressed through the New Local Plan. We would refer the Council to our separate representations regarding land at Banwell which provides further detail on our opinions on these key issues and the masterplanning and delivery of the strategic development locations.	
J Gower-Crane		(6. Central Parishes) JSP growth is affecting villages. What percentage of this growth is for NSC local residents (many will continue to work in Bristol but prefer cheaper NSC prices)? How can NSC consider developing on 'internationally-protected habitats', these should remain protected?	

Respondent Name	Respondent Organisation	Comment	Attached documents
KMH1		<p>The plans need to consider the knock on impacts from:</p> <ul style="list-style-type: none"> - traffic generated, largely to/from Bristol. (The plan is fibbing if it wishes to divert the traffic to Weston and Clevedon jobs, as opposed to Bristol) - flood risk, where urbanisation will reduce rain that soaks away and increase flows onto the nearby floodplain. Developers dodge environmental obligations by watering the down planning conditions. Suds becomes watered down! Langford Fields is a case in point. Who suffers? The community! Can a 30% to 50% density of housing truly manage future flood risk? - local services - will a 2500 home new town cope without a new school? 1000 plus new kids doing the commute to a new Yatton School will only exacerbate traffic impacts at Congresbury. There is a need to think again. 	
Lands Improvement		<p>3.19 As with Nailsea and Backwell, the focus of the Council on the Central Parishes, relates to the delivery of the proposed Garden Villages at Banwell and Churchill.</p> <p>3.20 The Council have identified a number of issues associated with the delivery of strategic growth in this location which highlight why we have reservations over the ability of the SDLs to deliver what they are scheduled to, over the plan period.</p> <p>3.21 Unlike the SDL at Nailsea, the Garden Villages are located in rural locations and adjacent to smaller settlements.</p> <p>3.22 We are concerned by the significant reliance on the strategic development locations at Banwell and Churchill given the overall cost of delivering the associated transport programme.</p> <p>3.23 The Transport Topic Paper 8 (WED007) indicates that the total cost to deliver the transport works for the SDL's is estimated to be between £1-1.4 billion and this would be "an ambitious programme and would represent a stepchange in the level of investment from that achieved in the last two decades". For the Banwell and Churchill components this is estimated as being between £180-185 million.</p> <p>3.24 As the Topic paper makes clear "in most cases, it is anticipated that the transport schemes will be completed either in advance of or during the early phases of housing build-outs in the relevant SDL's". Such a conclusion is not surprising given the standard of existing infrastructure and its ability to accommodate major strategic growth.</p> <p>3.25 Whilst, we do not object to the Councils pursuing ambitious programmes of work we remain sceptical that all works will receive funding (and it is understood none benefit from committed funding at present) and even if they are funded the associated timescales are likely to be significantly longer and therefore implementation and build outs will be significantly longer than currently envisaged and by consequence delivery of residential units will be over a much longer time horizon than currently anticipated i.e. all units complete by 2036 (except 125 dwellings).</p> <p>3.26 It is our position that the Council should reduce its dependency on infrastructure heavy strategic development locations within this plan period.</p> <p>3.27 We consider that the proportion for non-strategic development locations should increase to provide a more balanced approach.</p>	
Mendip Hills AONB unit	Mendip Hills AONB Partnership	<p>Whilst the central parishes comprising of largely rural areas in the south of the district lie outside the Green Belt, Banwell and Churchill and proposed SDLs of Banwell Garden Village and Mendip Springs Garden Village fall within the setting of the Mendip Hills AONB. This would need to be considered within the Local Plan.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>There is strong concern that the proposed housing quantum and significant infrastructure to support the proposed development in close proximity to the Mendip Hills AONB will have a significantly negative impact on the tranquillity, sense of remoteness and naturalness of the Mendip Hills AONB. There will be a cumulative impact on the road network system; one of the issues impacting on the Mendip Hills</p> <p>The Issues and Options document identifies some of the key issues applicable to the Mendip Hills AONB.</p> <p>Further issues to consider would be the impact of cumulative development of the Mendip Hills AONB and consideration of agricultural building conversions.</p> <p>We would highlight that the duty of regard to 'conserve and enhance natural beauty' within the Mendip Hills AONB and that this duty also applies to proposals outside of the boundaries of AONBs that may have an impact within the designated area.</p> <p>The DEFRA 25 Year Environment Plan sets out under paragraph 2.2.1 that 'Some of England's most beautiful landscapes and geodiversity are protected via a range of designations including National Parks and Area of Outstanding Natural Beauty (AONBs)... Over the next 25 years we want to make sure they are not only conserved but enhanced'. Paragraph 2.2.2 further sets out that 'In England, a quarter of our landscape is designated in this way, around 10% as National Parks and 15% as AONBs. We will make sure they continue to be conserved and enhanced, while recognising that they are living landscapes that support rural communities...'</p> <p>The Mendip Hills AONB Management Plan 2014-2019 sets out that 'The primary purpose of the AONB designation is to conserve and enhance natural beauty. In pursuing the primary purpose, account should be taken of the needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment. Recreation is not an objective of designation, but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses'.</p> <p>The Management Plan under paragraph 1.4 sets out a Statement of Significance on the special qualities of the Mendip Hills AONB that create the Mendip Hills sense of place and identity. A draft of the Mendip Hills AONB Management Plan 2019-2024</p> <p>on behalf of the joint local authorities is currently out to consultation with adoption proposed Spring 2019.</p> <p>Planning Practice Guidance (PPG) sets out that 'Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area. As part of this, local planning authorities and neighbourhood planning bodies should have regard to management plans for National Parks and Areas of Outstanding Natural Beauty, as these documents underpin partnership working and delivery of designation objectives. The management plans highlight the value and special qualities of these designations to society and show communities and partners how their activity contributes to protected landscape purposes'. (<i>PPG, Natural Environment (Landscape) section, paragraph reference ID 8-004-20140306</i>).</p>	
N Cooper	Claverham Future	<p>Infrastructure does not appear overnight. Talk of new Roads, Rail, Buses etc.. is ill formed nonsense until the plan details the way in which the schemes for any new infrastructure are fully costed, budgeted and programmes assure prior to the development which needs them. The location of Garden Villages will support the influx of further affluent commuters, not local job creation. The current plans are a recipe for chaotic problems on roads.</p>	
Nailsea		<p>The new road from the M5 to the A38 is necessary as it means that substantial Airport traffic can avoid Bristol and the surrounding communities</p>	
Natural England	Natural England	<p>This broad area contains a range of environmental sensitivities and so accommodating the transport infrastructure and other proposals without resulting in adverse effects on these and other interests will be extremely challenging. It will be critical therefore that further iterations of the development options for these areas are informed by robust ecological and landscape evidence and supported by strategic mitigation solutions, as outlined above.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Newland Homes	.	<p>3.1.2 It is acknowledged that development in floodplain areas is a key issue. As much of the Central Parishes area is located in low lying flood plain it will be important to steer development away from these areas unless it can be demonstrated that there are no other reasonable options available. This would reflect Paragraph 158 of the NPPF which states <i>'Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.'</i></p> <p>3.1.3 Banwell is a settlement which is predominantly located in flood zone 1 and is not constrained by any green belt. A number of other environmental constraints exist around Banwell including AONB on land further south of the settlement and the majority of land adjoining the settlement boundary is classed as 'high sensitivity' in the supporting Landscape Sensitivity Assessment document.</p> <p>3.1.4 However, there is also land adjoining Banwell which is unconstrained compared to other locations (such as Land south of William Daws Close). This site is located in Flood Zone 1 and is identified as 'medium sensitivity' in the Landscape Sensitivity Assessment 2018. These areas are less constrained and should be the focus for growth in the plan period. The Local Plan will need to identify policies and allocations to reflect this in the next stages of the process.</p> <p>3.1.5 It is noted from the SHLAA 2018 that much of the dwelling provision in North Somerset is reliant on supporting infrastructure delivery which will make it important to identify suitable opportunities for development on smaller sites which rely less on upfront infrastructure. This is important to ensure the early delivery of housing in the plan period.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>We consider that section 6 accurately sets out the issues for the Central Parishes. However, all these issues will need to be comprehensively examined at the JSP examination relating to strategic issues, the results of which will need to be taken into account in the Local Plan.</p> <p>One issue raised for the local plan to address concerns the need to improve the distribution of secondary schools across North Somerset by considering a new school at Yatton. It is not clear what evidence has been used to justify Yatton as the location for a new school and what alternatives have been considered. In particular the proposed highway and transport improvements associated with the two garden villages, in comparison to the poor road links to Yatton and the oversubscribed peak rail service should be a material consideration in assessing alternative locations.</p> <p>We note the proposals at Banwell and Churchill have been labelled garden villages. We also note that the Government invited bids for funding to support garden community proposals which closed on the 9th November 2018. It is not clear whether applications for funding were made. However we note the prospectus says the Government will prioritise proposals for new garden towns (more than 10,000 homes) over garden villages (1,500-10,000 homes).</p> <p>The Government prospectus also raises a number of concerns when applied to the Banwell and Churchill proposals. Firstly it expects the <i>'timely delivery of infrastructure'</i> to underpin creation of a variety of new jobs. However, the timing of delivery of improvements to the A38 and a new motorway junction are unclear which is confirmed by the proposed modification to the JSP which now proposes a <u>future</u> connection to anew M5 Junction 21a at a location to be confirmed and onward connection to the Churchill/Sandford bypass. Therefore, the two garden villages are entirely dependent on the provision of offsite highway infrastructure rather than supporting it.</p> <p>Secondly the prospectus recognises delivery of a garden community is a <i>'complex long-term project which will deliver homes over a number of decades'</i> and that the Government will prioritise proposals that <i>'offer a strong prospect of early delivery and a significant acceleration of housing delivery.'</i></p> <p>The housing shortfall in North Somerset needs to be addressed now in the short-term and it is not clear how relying on garden community proposals which are geared towards long-term implementation will assist in the necessary early delivery. For example, the designation of Taunton as a garden town and the additional resources that brought, came as a result of developments that were already established in the Taunton Local Plan, after many years in the pipeline. Labelling emerging JSP proposals as garden villages does not appear to offer the same advantages and solutions.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Puxton Parish Council	Puxton PC	<p>The Parish of Puxton (the villages of Puxton & Hewish) is not provisioned for within this plan. It is a busy Parish, adjacent to the area's busiest motorway junction, on a critical highway artery through North Somerset. It is a small but vital community of homes and businesses. It appears that it is to go forward to a time approaching the mid-point of this century with nothing provisioned for in terms of its future. This despite the possible infrastructural pressures resulting from the the proposed Banwell Garden Village an bypass projects immediately to our south.</p> <p>Puxton – never known to have been flooded - is on a tidal flood plain and has no settlement bounddaries. It has therefore tended to be discounted for development purposes over the years. However, there is likely to be pressure during the coming decades of the plan period,for small scale development within the Parish, even if just to hold itself together as a vibrant community. Our concerns have prompted us to provide further comments relating to settlements, below.</p>	
S Moore		<p>I disagree with the proposal to try and create artificial new "Garden Villages" - particularly at Churchill which has neither the transport links or employment opportunities to support a community of the size proposed. Why is NSC continuing to pursue this here, when so many issues have already been raised with this proposal, via the JSP consultation, which is still with the Independent Inspectorate? Why have sites closer to Bristol not been included?</p> <p>In addition, the proposals around highway infrastructure are insufficiently detailed but what little has been put forward would suggest simply channelling traffic through farmland to join further up the A38 (via new village bypasses) - but the A38 would still be single carriageway past the airport in and out of Bristol. What problem is this meant to be solving? There are already significant congestion issues on the local roads that run north/south across the central parish area - building a new road east/west doesn't address this, and building new houses in the area will only make the situation worse, particularly given that they would all be dependant on cars.</p>	
Taylor Wimpey - The Vale		<p>1.12. As set out in our introduction, we continue to object to the draft JSP and its identification of Banwell and Churchill SDLs. However, the key issue facing these two areas, which are amongst the most remote and poorly connected in North Somerset, is how they could possibly accommodate the largest amount of growth proposed within NSC (Banwell and Churchill SDLs combined) without unmitigatable, irreversible and unviable environmental, social and economic impacts.</p> <p>1.13. Other comments in response to the Banwell and Churchill SDLs are provided below in response to Questions 10 to 18.</p>	
Tom Leimdorfer		<p>Support the concept of the Garden Village at Banwell and the Banwell by-pass. Strongly oppose the Mendip Springs (Churchill) Garden village in a totally unsustainable location, requiring very expensive infrastructure and resulting in high volumes of out-commuting. Current developments in the Churchill, Langford, Congresbury and Yatton areas are exacerbating existing traffic safety and congestion issues in Congresbury and Yatton. The B3133/A370 junctions are at capacity at peak times and all future plans in the area should include options for mitigation with earmarked investment.</p>	
Viv Tomkinson	Congresbury Residents Association Group	<p>NSC's proposals for SDLs is completely flawed. It is essential that consideration be given to use of Green Belt land south of Bristol - this would be less damaging to the central parishes. Once the SDLs are imposed the agricultural and rural characteristics of North Somerset will be lost forever. You need to recognises that traffic congestion does not only effect Yatton, but also Congresbury, Churchill, Sandford, and Banwell. The level of investment needed to deliver the Banwell and Sandford/Churchill bypasses will never realistically be available to NSC - so NSC Planning Team needs to recognise this and develop proposals that are sustainable and deliverable.</p>	
WENP	West of EnglnD Nature Partnership	<p>The Document identifies the protection and enhancement of the environment as an issue, but does not present clarity on how it might address it.</p>	
Wrighton Parish Council	Wrighton Parish Council	<p>Yes – agree.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Wrington Village Alliance		<ol style="list-style-type: none"> 1. public transport must be a key issue that needs to be included in the consideration of any site 2. the site selection process should be reviewed and the application of Sequential Test needs reconsideration in the context of other major development that has been, and continues to be, developed in Flood Zone 2. 	

Document Part Name Q7. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?

Respondent Name	Respondent Organisation	Comment	Attached documents
A Mathison		<p>The proposed mendip Spring/Churchill development is adjacent to The Mendip Hills Area of Outstanding Natural Beauty.</p> <p>This area is more environmentally, ecologically and landscape sensitive than the green belt immediately south of Bristol.</p> <p>The environmental/ecological damage would be huge and permanent. It would appear that North somerset Council have no green credentials whatsoever.</p>	
Alice Barratt		<p>In relation to question 7 regarding Mendip Hills.</p> <p>The proposed Mendip spring/Churchill development is adjacent to the Mendip hills an area of outstanding natural beauty (AONB). This area is more environmentally, ecologically and landscape sensitive than the green belt immediately south of bristol.</p> <p>The environmental/ecological damage would be irreversible.</p> <p>There would be an increased amount of pollution in this very sensitive area.</p> <p>The development would also be clearly viewed from many places on the Mendip hills, a place visited for its outstanding natural beauty. An ugly urban sprawl would ruin this beauty.</p> <p>People should be encouraged to walk or cycle to work. It is not possible to walk or cycle to Bristol, W-S-M, or Bristol Airport from the Mendip Springs/Churchill garden village development.</p>	
Andrew		<p>The proposed housing estates at Congresbury and Banwell, and associated roads are fundamentally at odds with the protection of the AONB. A very small proportion of green belt could be re-designated at Ashton Vale to provide sustainable development (which would be consistent with the objectives of the JSP).</p>	
Avon Wildlife Trust	Avon Wildlife Trust	<p>We strongly agree that the increased pressure from recreation arising from the proposed development will be a key issue but we think the level of this risk is sufficiently highly that we think that the environmental implications of the development on internationally protected habitats should also be recognised here.</p>	
B Moss		<p>Community-led developments which are low-impact, zero-carbon, and of a beautiful vernacular style, with land-based livelihoods should be considered as reasonable developments to explore.</p>	
Blagdon PC	Blagdon Parish Council	<p>Blagdon Parish Council (BPC) considers that the major issues are all included.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>We welcome the assurances regarding protection and enhancement of the AONB.</p> <p>We support reasonable policies designed to promote local leisure opportunities.</p> <p>Rather than landscape impacts of the strategic development locations, we are more concerned by the impact on local roads through the AONB.</p> <p>We hope that North Somerset recognises the requirements of the recently published AONB Management Plan consultation.</p>	
Burrington Parish Council	Burrington Parish Council	Impacts of the proposed Churchill SDL and Banwell/Sandford/Churchill bypasses need to be considered in relation to the A368 and other surrounding roads, like Burrington Combe (B3134), especially if the bypasses are to be connected to the M5 at a new Junction 21A.	
C Chaplin		<p>The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty (AONB).</p> <ul style="list-style-type: none"> ▪ This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol. ▪ The environmental/ecological damage would be permanent - impossible to mitigate against. 	
Chris		Planning policy is meant to protect the Area of Outstanding Natural Beauty (AONB) however the proposal for the Mendip Spring / Churchill development will date this area of the Mendip Hills and this area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol, this damage will be irreversible	
Chris Butler		If we build on our rural landscape why would anyone from cities want to visit?	
Christopher Day		<p><u>Question 5</u>. I do NOT agree with the premise that the green belt around Bristol is inviolable. The justification of 'preventing sprawl from Bristol' makes no sense when set against the recommendations for a 'sprawl' of 4575 houses in so called 'garden villages' in the middle of established rural areas. The area between the new South Bristol Link and the city of Bristol is close to jobs, infrastructure and established public transport links. Building large scale housing there is the most sustainable option available in North Somerset.</p> <p>North Somerset is the only council in the former Avon to rule out the use of green belt land for housing. The expression:'large scale speculative housing proposals' holds no water when set against the equally large scale proposals being made, by the Council, for developments in Banwell and Churchill made in this plan. North Somerset Council appear to have noticed that the South Bristol Link, and sections of Bristol Airport, are on Green Belt land.</p>	
Christopher Day		The plan pays little attention to the issue of the proximity of its proposed 'garden villages' to the Mendip Hills AONB.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Cleeve Parish Council	Cleeve Parish Council	<p>The consultation has highlighted the impact of the proposed developments at Banwell and Churchill on views from and into the AONB but has excluded Bristol Airport. Bristol Airport needs to be considered as it delivers an impact on views as well as noise.</p> <p>Important view points in the local landscape, affected by development, should be discussed and agreed by all stakeholders and local community and the ways in which these will be protected should be included in the Local Plan.</p>	
Collier		<p>The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty (AONB).</p> <ul style="list-style-type: none"> This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol. The environmental/ecological damage would be permanent - impossible to mitigate against. 	
Congresbury Parish Council	Congresbury Parish Council	<p>We would agree that many of the issues raised here are also issues for villages such as Congresbury. We would expect these to be explored for other locations as well as the Mendip Hills.</p>	
CPRE Avonside	CPRE Avonside, North Somerset District	<p>Locating over 4,500 new houses and new roads adjacent to Mendip Area of Outstanding Natural Beauty is contrary to national and local policies together with Mendip AONBs own Management Plan and cannot be mitigated. They would have severe damaging environmental impacts on the Mendip Hills AONB including tranquillity, noise and lighting.</p>	
Desiree Tomlinson		<ul style="list-style-type: none"> Planning policy is meant to conserve and protect Area of Outstanding Natural Beauty (AONB) The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills (AONB) and will damage it. This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol. The environmental/ecological damage would be permanent - impossible to mitigate against. 	
Donna Rawlins		<p>The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty (AONB). What about those important Habitat Regulations? You cannot tell Bats where to forage as they cannot understand spoken language!!</p> <p>This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol. The environmental/ecological damage would be permanent - impossible to mitigate against.</p>	
Dr Moya Wilson		<p>It is the duty of planners to preserve the quality of AONB's, and parts of this one are SSSI's and Ancient Monuments, and used by walkers and cyclists from Bristol for peaceful recreation. This development would damage the AONB severely forever. Views would be spoilt from some parts of it and noise from the proposed dual carriageway would destroy the peace. This area is more sensitive, in terms of ecology, the environment and landscape, than the Green Belt site just south of Bristol.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
E Folkes		7.The Mendip Hills are so important to both the local residents and the many visitors that come to enjoy their beauty. The impact on the Mendip AONB of building the Mendip Spring Village would be damaging and irreparable. They and the surrounding area, which make them what they are, should be protected for our future generations to enjoy.	
E Johnson		<ul style="list-style-type: none"> • The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty (AONB). • This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol. • The environmental/ecological damage would be permanent - impossible to mitigate against. 	
E Lyons		<ol style="list-style-type: none"> 1. The proposed Mendip Spring development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty (AONB) and would adversely affect the area and its ecology which is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol. 2. The environmental/ ecological damage would be permanent. Once the countryside has been lost to tarmac and concrete it is lost forever. Independent reports state that such destruction would be impossible to mitigate against. 3. Light pollution would be invasive and highly detrimental to wildlife and the tranquillity of the countryside. 	
Ecomotive Ltd		As in Q5, we would emphasise the role of permitting limited development of affordable housing through CLH to meet local needs through Rural Exception Sites and also the role of community-led development in establishing rural livelihoods and homes on new smallholdings in the area.	
Gallagher Estates (represented by Barton Willmore)	Barton Willmore	<p>We consider that the proximity of SDL at Banwell to the Mendips Area of Outstanding Natural Beauty is a considerable restriction to future development.</p> <p>The AONB and its setting, form a highly sensitive landscape of distinctive components and characteristics, nationally designated for their scenic beauty. Development within the immediate setting of the AONB has the potential to cause a pronounced change to existing character and valued views from the Mendip ridge, resulting in a deterioration of the landscape composition and permanently altered views.</p> <p>It's landscape quality is described within the Mendip AONB Management Plan as having a "tangible sense of tranquillity and remoteness that are highly valued". Views are a key characteristic with long ranging panoramic views out from the edge of the plateau and slopes. The AONB is easily accessible via a network of public rights of way and recreational routes, making it a popular walking area where visitor focus is on the enjoyment of its landscape qualities, tranquillity, remote location and widely appreciated views out across the surrounding Locking and Banwell Moors landscape to the north. Development pressure and traffic (associated with the M5) are identified within the Management plan as detractors, impacting tranquillity and visual quality. North Somerset Landscape Character Assessment identifies Banwell as falling within the River Yevo Rolling Valley Farmland LCA, a transitional area between the Locking and Banwell Moors to the north and Mendip Ridges and Coombes to the south. Like Banwell and neighbouring villages, settlement throughout this character area is typically historic ribbon village development linked by a network of minor roads and winding lanes. These villages are set within the rural wide valley of predominantly pastoral character, described within the Assessment as "peaceful" and "in good condition". Part of the potential development area falls within the Locking and Banwell moors, a flat, open, pastoral landscape of sparse, isolated settlement. The openness of this landscape makes it particularly vulnerable to visually intrusive development. The area to the south falls within the Mendip Ridges and Coombes LCA which forms a distinctive and dramatic backdrop to the surrounding low-lying areas. Views out over the wide landscape below from this LCA are described as "striking" and are a key characteristic of this LCA.</p> <p>The NPPF at paragraph 172 places great weight to conserving AONBs. Future development at Banwell is likely to have a significant impact on the landscape and scenic beauty of the AONB contrary to national policy.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
GELLYBELLY		The proposed Mendip Spring/Churchill development is right under the shadow of the Mendip Hills Area of Outstanding Natural Beauty (AONB). The area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol. Any development would cause environmental and ecological damage and this would be permanent. The site itself is called Mendip Spring for a reason, it is low lying wet ground on the whole with its own unique habitats. The rivers fed by this area would ultimately suffer from any large scale development.	
H Parry		<p>Planning policy is meant to conserve and protect AONB's – promotion of the Mendip Springs SDL will damage this AONB</p> <p>The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty (AONB).</p> <p>The area is more environmentally, ecologically and landscape-sensitive than the Green belt immediately south of Bristol.</p> <p>The environmental/ ecological damage would be permanent – to mitigate against.</p>	
Hallam Land Management Ltd (David Lock Assoc)		HLM wish to raise concern that the Mendip Hills AONB has not been afforded sufficient weight in the sub-regional plan-making process, and this has resulted in unfavourable proposed allocations for strategic-scale development in Banwell and Churchill. As confirmed by an Inspector that refused the Gladman appeal at Banwell, the Mendip Hills Management Plan 2014-2019 identifies views to the north over the Severn Estuary as a special quality of the AONB and it is therefore considered that the proposed SDLs at Banwell and Churchill stand to cause significant harm to the AONB. As such HLM do not consider that policies or allocations are shown to have been designed to avoid nor mitigate landscape impact on the AONB. It is understood that the SDL broad locations are not within the remit of NSC, however the contingency sites should be ready to come forward should significant opposition to AONB development feature in the WoE JSP examination, and thus NSC should begin the preparation of a policy for the Land East of Clevedon, which presents a more sustainable option to development within the immediate setting of the AONB.	
J Gower-Crane		(7. Mendip Hills) The 'role of tourism and pressures for holiday accommodation' along with 'increased pressures for recreation' should not be allowed to compromise Bleadon's rural village community by over development as it will also destroy the reasons why tourists come to Bleadon in the first place. Tourism should be encouraged and created around open space and natural habitat recreation and education instead of man-made constructs. Outdoor pursuits will also improve public mental and physical health and well-being, which is also needed not just housing and economic growth.	
J Lyons		<ol style="list-style-type: none"> 1. The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty (AONB). The development will destroy the landscape and tranquility of the countryside beside the AONB. 2. This area of the proposed Mendip Spring/Churchill is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol. 3. The environmental/ecological damage would be permanent. Once the countryside has been lost to tarmac and concrete it is lost forever. Independent reports state that such destruction would be impossible to mitigate against. 4. Light pollution would be invasive and highly detrimental to wildlife and the tranquility of the countryside. 	
J Maycock		<ul style="list-style-type: none"> • The AONB and its setting area is severely threatened by the Churchill SDL proposals • The area is more environmentally and ecologically sensitive than the 'green Belt' immediately south of Bristol where you have refused development of 4,000 houses in the Vale. The damage to the environment is impossible to mitigate against. You have not considered the negative impact on tourism and amenity. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
Jan Murray	CALRAG	<p>6. Mendip Hills: Page 17</p> <p>6.1. NPPF 2012 (the version that may well be used for the JSP Public Examination</p> <p>- Consolidated Sustainability Appraisal Nov 2018 Point 4.9) notes:</p> <p>#114. Local planning authorities should:</p> <ul style="list-style-type: none"> ● set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of <i>biodiversity and green infrastructure; and [This has not been done]</i> ● maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast. <p>#115 Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.</p> <p>6.2. Building a new town at the very foot of the Mendip Hill AONB would be seen as a criminal act of vandalism by future generations.</p> <p>5</p> <p>6.3. North Somerset’s Landscape Character Supplementary Planning Guidance prepared by Wardell Armstrong and adopted in September 2018 –</p> <p><i>Landscape Strategy</i> states:</p> <p>6.3.1. <i>The Landscape strategy for River Yeo Rolling Valley farmland is to</i></p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>conserve [sic] the peaceful, rural nature of the landscape with intact pasture and field boundaries and to strengthen and enhance [sic] the area of weaker character particularly where the landscape is affected by <i>modern development to the west of the M5</i>. How does this fit with 6.1 above?</p> <p>6.4. The Habitats Regulations consultation poses interesting problems for wildlife in and around the land proposed for the SDL of Churchill/Mendip Spring. It would be inappropriate to deal with this at Local Plan level.</p>	
K Hanson		<ul style="list-style-type: none"> ◦ The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty (AONB). <ul style="list-style-type: none"> ▪ This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol. ▪ The environmental/ecological damage would be permanent - impossible to mitigate against. 	
Lesley Hegarty		<p>The Mendip Spring Garden Village proposal will be found to be unsound due to its proximity to the Mendip Hills Area of Outstanding Natural Beauty (AONB) for the following reasons:</p> <ol style="list-style-type: none"> 1. The proposal contravenes local and national planning policy in failing to conserve, respect, contribute to and enhance landscape , natural scenic beauty and special qualities (including, in particular, tranquility) of the local character of the area and of the Mendip Hills AONB (para 109 NPPF, policies DM10 and DM 11 Sites and Policies Plan 2016; policies CS5 and CS32 Core Strategy 2017,s.85 Countryside Rights of Way Act 2000 (CRoW), Mendip Hills AONB Management Plan 2014-19) 2. Specific statutory considerations apply to AONBs in respect of sites adjoining, affecting or within view of the AONB (s.85 CRoW, Mendip Hills AONB Management Plan paras 1.2.8 and 3.7.3 and policy DM11 Sites and Policies Plan (“development which would have an adverse impact on the landscape, setting and scenic beauty of the Mendip Hills AONB including views into and out of the AONB will not be permitted unless in exceptional circumstances”) 3. “Great weight” should be given to conserving the landscape and scenic beauty in AONBs which have the highest status of protection in relation tp landscape and scenic beauty” (para 115 NPPF; para 2.5.0 Mendip Hills AONB Management Plan) 	
M Abbott		<p>Mendip Hills</p> <p>The Mendip Hills are designated as an Area of Outstanding Natural Beauty. Planning Policy is meant to conserve and protect AONB. The proposed development is adjacent to the Mendip Hills and will damage them. The environmental/ecological damage would be permanent-impossible to mitigate against.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Michael Norman		The proposed Mendip Spring development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty which is of considerably more significance than the Green Belt south of Bristol	
Mr and Mrs Dobson		<p>It is frequently stated that development will not start until construction of infrastructure is delivered and the plans for Strategic Development Locations are very ambitious. A concern is that problems in delivering the Strategic Development Locations will lead to development pressure on other areas which are unsustainable and impact on the soundness of the plan.</p> <p>The principle that the integrity of the Mendip Hills AONB is respected is extremely important and it would be good to see a stronger statement to this effect in respect of the Strategic Development Locations at Banwell and Churchill.</p> <p>Modifications suggested</p> <ul style="list-style-type: none"> • <i>Strengthen the infrastructure delivery process.</i> • <i>Provide a stronger positive statement on the Mendip Hills AONB for the Strategic Development Locations at Banwell and Churchill.</i> 	
Mr S McNulty		The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty and would create permanent damage to the area in terms of visual appearance. The Council is placing financial gain ahead of the benefit to the public of retaining this land in its present state.	
N Green		<ul style="list-style-type: none"> • Planning policy is meant to conserve and protect Area of Outstanding Natural Beauty (AONB) • The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills (AONB) and will damage it. • This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol. • The environmental/ecological damage would be permanent - impossible to mitigate against. 	
Natalie Ward		The proposed development (Mendip Spring) is adjacent to the Mendip Hills which is a well known AONB, which means it is more ecologically, environmentally and landscape sensitive than the green belt immediately south of Bristol. Such development would permanently damage this area and should not be allowed to happen.	
Natural England	Natural England	We are pleased the I&O document acknowledges the potential for visual and other impacts on the AONB to arise as a result of the local plan. The Mendip Hills AONB Partnership is currently reviewing the AONB Management Plan, which appears to present an opportunity to ensure the Local Plan policies for the AONB and the aims of the AONB Management Plan are consistent and mutually supportive.	
P Chedgy		This area, which is very close to, and would be adversely affected by, the above proposed new development, is significantly more environmentally, ecologically and landscape-sensitive than the rather sub-standard GB immediately south of Bristol and the damage thereto resulting from the Proposed Development would be permanent.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	There is no need to assess the policy context in respect of AONB policy which is quite clearly set out in the NPPF that ' <i>great weight should be given to conserving and enhancing landscape and scenic beauty in national parks, the broads and areas of outstanding natural beauty which have the highest status of protection in relation to these issues.</i> ' In addition the conservation and enhancement of wildlife are also important and therefore the impact on the Mendip Bats SAC is a key issue which should also be assessed.	
Professor G R Pearson		It is the duty of planners to preserve the quality of AONB's. Parts of this one are SSSI's and Ancient Monuments, and used by walkers and cyclists from Bristol for peaceful recreation .This development would severely damage the AONB by spoiling views, and Increasing noise from the proposed dual carriageway. This area is more sensitive, in terms of ecology, the environment and landscape, than the Green Belt site just south of Bristol.	
S Moore		Building so close to the AONB (at Churchill) would not only damage the AONB and views from it, but would also undermine the existing tourism and recreational appeal of the area.	
SCT1967		It should be the ambition to keep the Mendip Hills AONB and surrounding areas as a sustainable area free from added pressures on transport, greater pollution and pressures on existing services. The plan for such huge housing developments will destroy precisely what makes the area so Outstanding, Natural and Beautiful - LEAVE IT ALONE!	
Simon Hegarty		<p>The Mendip Spring Garden Village proposal will be found to be unsound due to its proximity to the Mendip Hills Area of Outstanding Natural Beauty (AONB) for the following reasons:</p> <ol style="list-style-type: none"> 1. The proposal contravenes local and national planning policy in failing to conserve, respect, contribute to and enhance landscape , natural scenic beauty and special qualities (including, in particular, tranquility) of the local character of the area and of the Mendip Hills AONB (para 109 NPPF, policies DM10 and DM 11 Sites and Policies Plan 2016; policies CS5 and CS32 Core Strategy 2017,s.85 Countryside Rights of Way Act 2000 (CRoW), Mendip Hills AONB Management Plan 2014-19) 2. Specific statutory considerations apply to AONBs in respect of sites adjoining, affecting or within view of the AONB (s.85 CRoW, Mendip Hills AONB Management Plan paras 1.2.8 and 3.7.3 and policy DM11 Sites and Policies Plan ("development which would have an adverse impact on the landscape, setting and scenic beauty of the Mendip Hills AONB including views into and out of the AONB will not be permitted unless in exceptional circumstances") 3. "Great weight" should be given to conserving the landscape and scenic beauty in AONBs which have the highest status of protection in relation tp landscape and scenic beauty" (para 115 NPPF; para 2.5.0 Mendip Hills AONB Management Plan) 	
Tom Rawlins		<p>The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty (AONB). What about those important Habitat Regulations? You cannot tell Bats where to forage as they cannot understand spoken language!!</p> <p>This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol. The environmental/ecological damage would be permanent - impossible to mitigate against.</p>	
Viv Tomkinson	Congresbury Residents Association Group	<ul style="list-style-type: none"> • The Mendip Spring SDL proposal will cause substantial harm to the Mendip Hills AONB and this harm cannot realistically be mitigated. NSC must identify policies and allocations that not just avoid the landscape impact of the SDLs on the ANOB - the policies and allocations must not even countenance any proposals which will adversely impact the AONB. 	

Document Part Name		Where will the non-strategic sites be?	
Respondent Name	Respondent Organisation	Comment	Attached documents
Anthony Clarke		<p>I note that an area off Leyfield Road at Greenways Farm and the land to the left of Collum lane is shown as suitable for housing?</p> <p>First point, there is no infrastructure or suitable road net work to support such a development in this area. Secondly and more importantly, this area of Western offers a largely unspoiled open aspect towards the Old Priory and sand point etc. To build houses in this area would spoil the landscape and environment.</p> <p>Western does not have a good reputation for developing infrastructure and road systems etc. Before any substantial building an additional junction on the M5 (junction 21a) servicing the Bristol direction must be built. Thus in order to reduce traffic flow into and around the suburbs of Western new houses and other buildings must be built in the areas of close proximity the M5 junctions.</p>	
Aston	Aston and Co UK	<p>Landscape Sensitivity Assessment (2018)</p> <p>The landscape report prepared by Wardell Armstrong for NSC has been reviewed by The Landmark Practice and a response to its findings is set out in Appendix A. The Landmark Practice undertook a detailed analysis of the land at Black Rock (SHLAA Ref: HE18124) in both summer and winter conditions and their full report is also contained in Appendix A. They reached a different and positive conclusion regarding the site and land to the North of Hollis Avenue (paras 6.4.21).</p>	
Aston	Aston and Co UK	<p>North Somerset Strategic Housing Land Availability Assessment</p> <p>The approach taken to Land Availability Assessment by NSC has already been set out in detail. Our primary concern is that of the land identified and entered into the forward plan process, most sites have been discounted without full and proper wide ranging testing. That does not lead to robust plan making and is considered unsound.</p>	
B Moss		<p>Community-led, low-impact, zero-carbon, affordable housing must be prioritised in exploring 'non-strategic' housing developments</p>	
Burrington Parish Council	Burrington Parish Council	<p>The distinction to be made is between strategic and non-strategic sites (i.e. large and small sites) not between strategic and non-strategic growth. There is no distinction in terms of the kinds of housing or sources of housing need. Local housing needs will need to be accommodated on large and small sites. A greater variety of sizes and sites is needed to meet demand and to ensure greater variety and continuity of supply, by a variety of builders, as recommended by the Letwin Review of Build Out (October 2018). In the past, settlement hierarchies in North Somerset Local Plans have been too prescriptive and inflexible and have constrained housing supply.</p>	<p>Letwin review web version.pdf (565 KB)</p>
C Twine		<p>Where will the non-strategic sites be and settlement boundaries?</p> <p>4.14 The Council are not currently making reference to specific sites at this point but do suggest that those shown on the Council's latest Strategic Housing Land Availability Assessment (2018) give a strong indication of preference.</p> <p>4.15 It is understood that our client's land was not considered but would have likely been discounted given the existing Green Belt designation which would have ensured it did not pass the Phase 1 sieve.</p>	<p>Mrs Catherine Twine.pdf (1.3 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>4.16 The Council also is consulting upon two options regarding the review of settlement boundaries and the current flexible approach to development adjoining the settlement boundary.</p> <p>4.17 Accordingly, our preference is Option 1 that existing boundaries should be adjusted to account for any existing or proposed allocations and the flexible approach to sites beyond boundaries being retained. It is worth revisiting why this policy was introduced. It was introduced because the Council had struggled to deliver sufficient sites within existing boundaries and a general weakness in the Council's supply trajectory. Given our comments above we consider this is likely to remain to be an issue going forward.</p> <p>LAND AT COURT FARM, WINFORD</p> <p>5.1 Our clients land at Winford is sustainably located and well related to the existing settlement. It is relatively unconstrained (beyond the Green Belt designation) and offers a realistic prospect of delivering non-strategic development.</p> <p>5.2 We believe that there is an existing affordable housing need within the Winford and adjoining Parishes which cannot easily be met, and we want to work with officers and the local community to explore this further.</p> <p>5.3 We also believe that our client's land can not only deliver meaningful and much needed affordable housing but can also deliver significant transport benefits by helping to address the existing width restrictions and footpath connections at the southern end of the village. It is only our site that can achieve this, and we would welcome and endorse a Green Belt release to allow this site to come forward.</p> <p>5.4 There is an existing highways safety concern regarding the width of Chew Road/Regil Lane corner. At present there is limited width and reduced pavement in this location. The only means of addressing this is by using land within my clients control which would result in a significant community benefit.</p> <p>5.5 We would welcome the opportunity to discuss the site further with North Somerset Council during the new Local Plan progressions.</p>	
Coln Residential (DLP Planning)		<p>RESPONSE TO THE LOCAL PLAN EVIDENCE BASE - North Somerset Strategic Housing Land Availability Assessment 2018 Main Report</p> <p>The site at Land at Dinghurst Road, Churchill was submitted by Coln Residential to the Council's 2017 Call for Sites process and has been assessed in the Council's 2018 Strategic Housing Land Availability Assessment (SHLAA) under site reference HE1889. Coln Residential thought it prudent to provide a response to the Council's assessment of the site.</p> <p>Table E1 of the SHLAA compares the housing requirement set by the emerging JSP for North Somerset from 2016-2036 and compares it with the potential housing supply over the plan period. Of the 25,082 dwelling requirement the Council can currently identify 22,316 dwellings through: completions from 2016-2017; planning permissions at October 2017; windfall from 2026-2036; Site Allocation Plan allocations; and the emerging Strategic Development Locations at Nailsea, Backwell, Banwell and Churchill. This means that the Council must identify 2,766 dwellings through the New Local Plan in order to meet the housing requirement.</p> <p>Only 13 sites have been assessed as 'likely' A sites and these sites have capacity for approximately 638 dwellings. Coln Residential strongly agree with the Council's overall commentary that identifying sufficient suitable sites to meet the emerging JSP dwelling requirements is going to be extremely challenging and will require the consideration of a range of complex sites identified as having 'less likely' potential.</p> <p>Land at Dinghurst Road, Churchill is assessed by the Council as a 'less likely' B site in the SHLAA. The Council's explanation of a B site is: "The site is considered to have some potential for further consideration however it is subject to significant constraints or it may not form a suitable allocation in itself. In many cases it may rely on wider measures to make it more suitable or achievable such as the cessation/relocation of an existing use."</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The Council have assessed the site's constraints as: "Bat consultation band C. Site potential to be associated with new strategic transport interventions associated with Churchill SDL. Development of this site would link parts of settlement into a larger form of settlement."</p> <p>Of the 13 category A sites identified, 6 are also within the bat consultation zones. Of these 6 sites, 5 are in either Band A or Band B and are therefore of higher importance for bats than the site at Dinghurst Road.</p> <p>With regards to the concern that the site would link parts of the settlement into a larger form of settlement, we would argue that the development of this site would act as a natural extension to the existing settlement without damaging the integrity of the wider landscape character or the AONB. Its central location is very accessible to all the settlement's existing facilities and therefore quite sustainable when compared to more peripheral alternatives.</p> <p>The site is not reliant on the major transport infrastructure outlined in the emerging JSP coming forward, so it is felt that it is not tied to the Mendip Spring (Churchill) SDL. It is therefore believed that the site can be brought forward early in the plan period.</p> <p>The site is largely unconstrained and we would urge North Somerset Council to consider the site as a 'likely' category A site which could potentially be allocated in the New Local Plan to meet the authorities non-strategic development requirements.</p>	
Congresbury Parish Council	Congresbury Parish Council	We would like to see more weight given to neighbourhood planning. It seems section 3 provides only a small paragraph on how neighbourhood plans will work and we believe more detail should be given and how North Somerset Council will adhere to these plans.	
Cresten		The lack of an overall strategy and structure plan, and simply relying on sites being put forward for commercial development, means that proportionate growth of settlements cannot be achieved. Communities have no certainty that necessary infrastructure to support increased development will be provided, because of the lack of an overall strategy. If smaller sites are favoured, CIL contributions will not be sufficient to provide the community facilities needed, meaning that incoming residents will be competing with existing residents for access to inadequate facilities.	
D.Hayler		<p>As the Local Plan consultation document identifies, Neighbourhood plans sit alongside the Local Plan and carry the same weight in making decisions on planning proposals for the area covered by the plan. Neighbourhood plans allow communities to shape, direct and help to deliver sustainable development of all kinds within their own neighbourhood. This means they can contain policies and proposals to meet the housing need within the neighbourhood area and propose some local housing growth. In doing so they should generally conform to the Local Plans housing strategy and not propose less growth, but they can propose more.</p> <p>There is a requirement for all development to be sustainable. This requires an understanding of the nature of the local community, the infrastructure involved, any planned changes to that infrastructure, and the ability of residents to access services and facilities in a sustainable way - typically located in local 'service villages' (as currently designated). In the case of Claverham's Neighbourhood Plan, all these issues were considered over a considerable period and in considerable depth in its development, and the Plan was overwhelmingly voted for by the residents. The plan identifies suitable opportunities for increasing housing stock beyond the normal expectation for a village of this size and type; no other areas were able to be identified that were in keeping with the approaches and policies identified within the Plan.</p> <p>The desire for a landowner to offer their land for housing development is, of course, understandable for many reasons, not least of which may be the commercial advantage of having one's land approved for housing. However, a willingness to sell land for development should not be confused with its suitability for that purpose.</p> <p>There are two sites within the Neighbourhood Plan Area for Claverham which are currently 'assessed as potentially being suitable for development subject to further plan making' within appendix B of NS's Strategic Housing Land Availability Assessment 2018. Both of these are within the 'B Sites' category The first is:</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Reference HE 18200 - West of Jasmine Lane, Claverham). This is agricultural land surrounded by agricultural land with no connection to the village shape or structure. It sits outside of any and all elements of the Neighbourhood Plan and would add a level of housing unsustainable for the village both now and with any development that could conceivably be anticipated in the future.</p> <p>Reference HE 18209 (North of Chestnut Drive, Claverham). This is agricultural land currently shown on the 'B Sites table' with 'surrounding land use' as 'Residential'; however, this is incorrect. The land is bordered on two sides by residential land, but on the third by a designated village green, and on the fourth by agricultural land. It sits outside the settlement boundary within the Neighbourhood Plan and always has (indeed it has been the same shape and together with the Village Green for over 200 years). This land was considered when developing the Neighbourhood Plan b was discounted on a number of grounds. Many of these are well documented in relation to an outline planning application (which was in fact withdrawn before being decided) relating to both the (now) village green, and this land ref HE 18209. I will not reiterate all the issues raised with regards this land as they are a matter of public record, but should be referred to in any future consideration should this land come forward again. Among other things, the land floods and is typically saturated throughout the winter months, is of special interest for bats, is an integral part of the village landscape due to its proximity to the village green and heritage assets. The land sits outside of any and all elements of the Neighbourhood Plan and would add a level of housing unsustainable for the village both now and with any development that could conceivably be anticipated in the future.</p> <p>Discussions of 'infrastructure' for Claverham are unrealistic. While removal of 'infill village' status may ease the housing burden elsewhere and make NSC's job simpler, the truth of the matter is the village is suitable for little else other than infill. The 'windfall' of the UTAS site was recognised and actively pursued in the Neighbourhood Plan because of the benefits of an injection of housing to Claverham, and to meet NS's requirements. However, it is unsupportable to suggest that Claverham would remain sustainable if there was to be the addition of either of the two sites (HE 18200 or HE 18209) together with their additional 75 - 150 houses on top of the 77 planned for the UTAS site. The % increase in the scale of the village in terms of dwellings would simply be too great.</p> <p>It is important to recognise that comments and promises relating to infrastructure improvement are far easier to make than the evidence-base proves they are to deliver. Infrastructure typically lags many years behind residential development (if it ever happens), even more so where national considerations and government decisions are involved (irrespective of politically convenient promises).</p> <p>A focus on existing infrastructure, known improvements already in development and proximity to the actual employment and recreational markets the housing is supplying is critical. Framed in this way, required future development can be located where it is sustainable, meets the required needs and can be delivered with a positive impact on NS. Without this focus, NS will inevitably be tempted to ensure 'everyone gets a little bit' to thinly spread opposition, resulting in development which lacks the necessary infrastructure (possibly forever) and is therefore unsustainable.</p>	
Diane		<p>How will Neighbourhood Plans fit with the Local Plan?</p> <p>A reference to Town Visions would be appropriate in this section.</p>	
E Folkes		<p>9. We are in danger of urban sprawl, creeping urbanisation with the proposals, especially in view of the number of houses already being located in Churchill and Langford. Settlement boundaries need to be reinforced and protected to keep our villages' own individual identities.</p> <p>In all honesty the government's current policy of housebuilding has caused many problems.</p> <p>I understand that there are some 1.4 million potential plots on brownfield sites according to the CPRE. There are many empty houses which owners should be forced to let or sell. Just recently in the news were the thousands of MOD houses lying empty, some for 10 years, which tax payers are funding. They will also need completing renovating, paid for by the tax payer, as they have been vandalised and stripped. Surely these would be better placed to be used for housing.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>I am even aware of council tenants that are not occupying the houses that have been let to them, for one reason or another, which could go to those in need of them.</p> <p>The policy of excessive housebuilding is not the solution to the housing problem. Making houses affordable is. I do not believe that houses are selling as well as they could and just looking at Rightmove and other estate agents shows that houses, including the new builds, are being reduced in price. Potentially we are going to see people in negative equity again before long.</p>	
FH		All brownfield sites should be considered assuming there is no soil contamination.	
Gallagher Estates (represented by Barton Willmore)	Barton Willmore	<p>The provision of non-strategic growth appears to be the residual element leftover once other forms of supply are subtracted from the overall requirement, rather than being informed by the level of need.</p> <p>The evidence shows that a housing requirement that reflects the full OAN for the WoE and North Somerset demonstrates a need for a larger number of SDLs and non-strategic sites in North Somerset.</p> <p>Notwithstanding this, there is expected to be a shortfall of at least 3,025 homes undelivered (based on the JSP's current housing requirement) within North Somerset before the end of the JSP period in 2036 at the Banwell and Churchill SDL alone.</p> <p>Based on the existing JSP housing requirement, non-strategic housing growth will therefore need to increase significantly from 1,000 to at least 4,025 homes by 2036.</p>	
J Weston		Any new housing needs to be affordable and also only built with increase to amenities - doctors, school places - the town can't keep growing with out the support services being in place. Also green belt land needs to be left alone before what makes Portishead a beautiful place to live disappears	
Kit Stokes	StokesMorgan Planning Ltd	<p>Release Selective land from the Green Belt</p> <p>We are instructed by Mr S. Weeks owner of the builders yard adjoining the Girl Guides HQ Weston Road Long Ashton. Selective release of land from the Green Belt should be considered so that the burden of development is balanced across the district and housing delivery does not rely on 4 large housebuilders and prior provision of transport infrastructure.</p> <p>Whilst the Green Belt to the south/south-east of Long Ashton performs an important role in providing separation from Bristol, this Green Belt role can be safeguarded and along with the land at Gatcombe Farm is well positioned to help deliver this. It is located on the western edge of Long Ashton and does not perform a role in preventing the merger of Long Ashton with Bristol. It is therefore able to accommodate a level of residential development as part of a strategic development proposal, and would help in providing flexibility over the spatial arrangement of development areas and retention of open land in order to safeguard the Green Belt role to the east.</p> <p>This site could deliver upto 30 new houses and would amount to development of previously developed land. This is a good example of land in the Green Belt which is of little landscape value and development will have no impact on openness.</p>	builders yard.JPG (110 KB)

Respondent Name	Respondent Organisation	Comment	Attached documents																		
Lands Improvement		<p>4. LOCAL HOUSING GROWTH</p> <p>4.1 We note that, as currently drafted, the Issues and Options document seeks to take forward the figures which are set out within the emerging West of England Joint Spatial Strategy (JSP). Examination hearings are scheduled for May 2019 and one of the early sessions will be around the overall housing requirement for the region before moving on to consider some of the identified Strategic Development Locations (SDLs).</p> <p>4.2 We consider it likely that there will be changes to both for the following reasons:</p> <ul style="list-style-type: none"> • the overall housing requirement is too low and does not take full account of the affordable housing need for the region; and • several of the strategic development locations are not deliverable without significant funding for infrastructure (see our comments within paragraphs 3.21-3.26 above). <p>4.3 In the case of the housing requirement the current IOP is predicated on the submission version of the JSP which identifies a need for 102,200 new homes across the Plan area and the expectation that North Somerset will deliver some 25,000 homes. Of which only 1,000 dwellings have been allocated to non-strategic growth.</p> <p>4.4 As we and many others (including the Home Builders Federation) have suggested this overall requirement for the JSP area and that attributed to North Somerset is too low. This under estimation can be attributed to three inter related issues:</p> <ul style="list-style-type: none"> • Addressing housing affordability; • Low economic growth assumptions; and • Lack of adjustment to meet significant affordable housing needs. <p>4.5 Although the JSP is being examined against the requirements of the National Planning Policy Framework (NPPF, 2012), the new standardised methodology for calculation of local housing need based on household projections and housing affordability makes for interesting comparison. It is of note that the standard method achieves only a minimum housing need figure and further uplifts may be considered necessary.</p> <p>4.6 The standard method results in the following outcomes:</p> <table border="1"> <thead> <tr> <th>Authority</th> <th>1 Year Requirement (dwellings)</th> <th>20 Year Requirement (dwellings)</th> </tr> </thead> <tbody> <tr> <td>Bath & North East Somerset</td> <td>657</td> <td>13,138</td> </tr> <tr> <td>Bristol</td> <td>2,440</td> <td>48,802</td> </tr> <tr> <td>North Somerset</td> <td>1,338</td> <td>26,760</td> </tr> <tr> <td>South Gloucestershire</td> <td>1,402</td> <td>28,030</td> </tr> <tr> <td>West of England Total</td> <td>5,836</td> <td>116,730</td> </tr> </tbody> </table> <p><i>Table 1 – West of England Summary Standard Method Requirements</i></p> <p>4.7 By consequence if the JSP's figures are too low and North Somerset's apportionment then any North Somerset Plan will be seeking to deliver numbers which are not accurate.</p> <p>4.8 As a result, it is our opinion that there will be a need to deliver in excess of the 1,000-dwelling non-strategic growth currently identified for North Somerset over the plan period. We agree that this level of growth should be steered to the most sustainable settlements within the District but acknowledge that the current Issues and Options document does not indicate where the Council intends to meet these needs.</p>	Authority	1 Year Requirement (dwellings)	20 Year Requirement (dwellings)	Bath & North East Somerset	657	13,138	Bristol	2,440	48,802	North Somerset	1,338	26,760	South Gloucestershire	1,402	28,030	West of England Total	5,836	116,730	
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		<p>4.9 It is understood that the Council will seek to identify potential sites, using the SHLAA, as part of its preferred option document. Whilst we agree that this would be a suitable point at which to identify specific sites, we question whether the Council will have an appropriate evidence base to reach such a conclusion given our commentary in relation to the Green Belt as discussed above.</p> <p>4.10 The conclusions drawn as part of the SHLAA exercise to date focus on the existing policy framework and, as a result, sites within the Green Belt, for example, are unlikely to score positively. We would therefore suggest that the Council needs to undertake a detailed review of the Green Belt now so that opportunities are not being lost simply because out of date evidence is informing local plan decision making. We note that a number of the Strategic Development Locations are currently within the Green Belt but will be removed as part of the future Local Plan adoption process. We would suggest that a similar approach could also be taken for the non-strategic element.</p> <p>4.11 A more detailed review of the Green Belt will also help communities producing neighbourhood plans to be able to make allocations to address community needs, particularly those that cannot be met within the existing settlement boundary and are otherwise constrained by the Green Belt designation.</p>	
Locking Parish Council	Locking Parish Council	<p>The following should be protected in respect of the Plan</p> <p>Green Buffers, Green Belt, Settlement Boundaries and Strategic Gaps.</p>	
Long Ashton Parish Council	Long Ashton Parish Council	<p>Page 19 NDPs</p> <p>LAPC spent a considerable amount of time and effort to develop a NDP. It seems that it is relatively easy for developers to set aside these plans if they are considered not to be “up to date”. The revision of a plan requires the same process as approval of the original plan, including examination by an inspector and a referendum, a process which is costly and unlikely to be undertaken by a parish a second time. There is little assurance elsewhere in the document that NDPs will receive consideration and incorporation into the Local Plan. Developers seem to regard NDPs as being an easy target to set aside inconvenient policies. Policies are needed in the plan that will support and protect NDPs and ensure their long term retention.</p> <p>The plan does not give any consideration to the effect on housing capacity of the construction of extensions and annexes. These local developments must make a considerable contribution to the effective number of “homes”, and their effects should be taken into account.</p>	
Mendip Hills AONB unit	Mendip Hills AONB Partnership	<p>With reference to the North Somerset Strategic Housing Land Availability Assessment Main Report dated September 2018, whilst the methodology Part 1 assessment excludes sites which are entirely within the AONB, we would consider that sites adjacent to settlement boundaries and which fall partly within the AONB and which propose housing of 10 units or more should, where development (including of infrastructure) falls within the AONB, also be excluded within Part 1 assessment.</p> <p>The National Planning Policy Framework under paragraph 172 sets out that ‘the scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest...’ The Defra 25 Year Environment Plan under paragraph 2.2.2. further sets out that ‘while development is not prohibited in National Parks or AONBs, major development should take place only in exceptional circumstances’.</p> <p>In terms of Part 2 assessment of SHLAA sites, we would request that assessment include reference to sites within the setting of the Mendip Hills AONB. The Countryside and Rights of Way (CRoW) Act 2000 confirmed the significance of AONBs and Section 85 places a statutory duty on all relevant authorities to have regard to the purpose of conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within an Area of Outstanding</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Natural Beauty. Potential development proposals outside of the boundaries of AONBs that may have an impact within the designated area are also covered by the 'duty of regard'. Consideration should also be given to the cumulative impact of the any SHLAA sites on the setting of the Mendip Hills AONB.</p>	
Mendip Hills AONB unit	Mendip Hills AONB Partnership	<p>The North Somerset Core Strategy currently provides that in service villages, up to 25 dwellings may come forward adjacent to settlement boundary providing the sites meet the requirements set out in the policies for each area. Service villages include Banwell, Churchill and Winscombe.</p> <p>We would highlight that the NPPF sets out under paragraph 172 that 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues ... The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest ...'.</p> <p>The DEFRA 25 Year Environment Plan further sets out that 'While development is not prohibited in National Parks or AONBs, major development should take place only in exceptional circumstances'.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>North Somerset Wide Issues</p> <p>The map on page 8 of the document maps the 3 main constraints in North Somerset – Green Belt, AONB and flood risk area. However, these are then treated as absolute constraints and the main areas of proposed development are located in those areas where none of these constraints exist. In the first instance this is an issue that will be explored at the Joint Spatial Plan (JSP) examination, but even if that does not make any changes which would affect the Local Plan Strategy, or if the JSP requires more development to be found, it is also relevant for the Local Plan 2036. NPPF paragraph 7 says '<i>the purpose of the planning system is to contribute to the achievement of sustainable development</i>'. Therefore the JSP and the Local Plan have to demonstrate that the proposed development locations meet that high level objective. Constraints should not be considered as absolute if they preclude the consideration of more sustainable options. The JSP dismisses all alternatives without assessing them in the same level of detail as the JSP proposals themselves.</p> <p>Even if the JSP remains unchanged, the Local Plan will need to demonstrate the development it proposes is sustainable and carry out the same assessment on detailed rather than strategic proposals. In that respect it should consider the potential for sustainable locations in the Green Belt and it should not assume the flood risk areas on the constraints map are absolute constraints as demonstrated by existing development in flood risk areas which are otherwise protected.</p>	
R Waycott		<p>The document focuses on large scale development on greenfield sites, when there are remaining Brownfield sites and PDL in North Somerset being offered for development and refused.</p> <p>Large scale development on green field sites, which then require large scale development of infrastructure to connect to employment and services, is contrary to existing policy, and indeed contrary to the objectives set out at the beginning of the document. Large scale development away from employment does not encourage people to walk or cycle to work, but actually encourages car use, and creates further pollution and reduction in air quality.</p>	
Tom Leimdorfer		<p>The 'call for sites' and SHLAA process confuses residents, particularly where a Neighbourhood Plan is being developed at the same time. There needs to be clarity and transparency about the status of sites listed, where they are not part of any adopted Sites Allocation and are contrary to proposals in emerging Neighbourhood Plans.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Vence LLP		<p>We note that the Councils SHLAA which supports the Issues and Options Document has considered the larger development site in question under site reference HE18287 and has discounted it as a possible site to deliver its housing need. Further to our conversations with Joy Milson within NSC's planning policy team, we understand that the site has been included due to its submission to the JSP in 2015 and because part of the site falls within NSC boundary (albeit there would not be any housing on this part of the site). We understand it has been discounted as it is currently Green Belt and no sites within Green Belt have been considered for development by NSC. We trust this will be reviewed in light of the potential release of the wider site by BCC and the findings of the JSP's Stage 2 Green Belt Assessment.</p> <p>We also note the suggestion that the site is within fluvial flood zone 3b. According to the Councils own online mapping system, the vast majority of the site in question is not within flood zone 3b. It would be helpful if this were clarified in the SHLAA table.</p>	
Wainhomes		<p>3. Local Housing Growth</p> <p>2.5. It is not clear from the Issues and Options document how much non-strategic growth the Council considers will be necessary between 2016 – 2036. The document appears to suggest that the 1,000 new homes will be required in addition to development at the Strategic Development Locations (SDL's) although this should be clarified. The Council should confirm whether the proposed housing figures will be expressed as a minimum or whether another requirement should be applied.</p> <p>2.6. The acknowledgement that proportional growth will differ from place to place based on a number of factors is generally welcomed.</p> <p>2.7. The acknowledgement that proportional growth will differ from place to place based on a number of factors is generally welcomed. For instance whilst the Adopted Core Strategy identified Sandford as a lower order settlement it is recognised that it shares many services with Winscombe and as a whole lies in a sustainable location.</p> <p>2.8. In accordance with the NPPF 2018 small and medium sites of less than 1ha will be an important aspect of the housing supply and should be encouraged. The Council should however provide evidence to support the suggestion that these types of sites typically achieve 40 dwellings per hectare and are "relatively easier to deliver".</p>	<p>Sandford Final Representations 10.12.18.pdf (197 KB)</p> <p>Sandford Location Plan (160302 L 01 01).pdf (144 KB)</p>

Document Part Name Q8. What are your views on the options for a revised settlement hierarchy?

Respondent Name	Respondent Organisation	Comment	Attached documents
Abbots Leigh Parish Council		<p>Easton-in-Gordano/Pill is a service village and we would expect it to retain that status. Abbots Leigh is currently 'countryside' (albeit with a historical 'Village Fence') but is likely to become a settlement. Preliminary thinking on the Neighbourhood Plan suggests that there might be infill sites in both settlements but also small adjacent sites outside the settlement boundaries which could offer provision for some housing.</p> <p>We dislike the category of 'Infill Village' and suggest that the term 'settlement village' might be appropriate.</p>	
Alder King (M Cullen)		Q8. What are your views on the options for a revised settlement hierarchy?	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>6.5 Option 1 is preferable. The existing hierarchy has a clear rationale in that growth is primarily directed towards settlements that have a greater provision of services and amenities in the first instance. Adding another tier would likely over-complicate the policy position.</p> <p>6.6 The University of Bristol's site is situated adjacent to Langford, which to date the Council have failed to list in its settlement hierarchy. Although larger, it offers similar services to Churchill and therefore it has been assumed that it can be afforded Service Village status. There is a good level of services within the village with a primary school and doctors' surgery in close proximity to the Wyndhurst Farm site, as well as local shops and post office within walking distance. Furthermore, the University of Bristol Veterinary School is located directly to the north of the site and is a large employer in the area.</p>	
Alex		I question whether the hierarchy is "familiar to and well understood by local communities". Each community thinks of itself as an individual case, and should be treated as such.	
Aston	Aston and Co UK	<p>Option 1, Retain Existing Hierarchy – This option is supported. The established hierarchy makes sense as it orders the settlements by size and it is the larger settlements that should be the focus of development as they already have the necessary infrastructure and services.</p> <p>It is agreed this option is well understood and familiar to all.</p> <p>The garden village concept remains untested and viability was not demonstrated by BNP Paribas. Until this is tested during examination and until all the land put forward during the Call for Sites is examined properly, it is premature to consider changing the hierarchy of settlements and no conclusions can be drawn.</p> <p>There is no reason for the retention of the existing hierarchy to lead to the overlooking of smaller settlement solutions. That can be avoided by following a simple logical plan review process.</p> <p>Option 2, Expanded Hierarchy – Initially sounds attractive and there is likely to be some opportunity for limited supporting development within or adjacent to the smaller villages but this takes the focus away from the established principle that the larger settlements should rightly remain the focus of sustainable development.</p> <p>Option 3, Growth Based Strategy – We would welcome a separate growth based policy to ensure that smaller settlements, hamlets, locations within Green Belt but close to larger settlements do not become unnecessarily blighted by restricting all and any development. This could focus around the Government's intention to support economic vitality in rural areas. It could beneficially be the home of a policy that supports limited scale Live-Work units that make use of roll-out fibre to the premises and encourages small scale rural employment without the associated commuting/transport effects.</p>	
Backwell Parish Council	Backwell Parish Council	<p>BPC broadly supports Options 1 and 2 for a revised settlement hierarchy. This would retain the current hierarchy but with a review of all settlements and inclusion of an additional tier for larger infill settlements and smaller service villages giving capacity for small scale growth, where appropriate.</p> <p>BPC would object to a growth-based strategy as outlined in option 3. The grouping of all settlements with capacity for housing into a single category, with criteria-based policies to guide development, would inevitably result in an increase in speculative planning applications for housing. Such a policy approach would be akin to the presumption in favour of sustainable development established by the National Planning Policy Framework (NPPF), which</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>allows speculative planning applications to be considered favourably where the Local Plan is out-of-date. In the interests of achieving an effective planned system, the growth-based strategy is opposed.</p> <p>Although it is noted that “tightly-worded” criteria would be introduced, these would invariably be subjective and open to interpretation. Moreover, the use of criteria in lieu of housing allocations within the Local Plan would offer no certainty to local communities in respect of the location or scale of new housing planned for their area. This approach would also obviate the planned provision of strategic infrastructure to support new development, where the locations for new growth are unknown until the planning application stage.</p> <p>A further concern regarding Option 3 would be the potential to skew the distribution of housing growth across the District, with the potential for high levels of housing to be delivered in the more rural areas, compounding the problems associated with the JSP spatial strategy.</p>	
backwellresidents	Backwell Residents Association	<p>BRA broadly supports Options 1 and 2 for a revised settlement hierarchy. This would retain the current hierarchy but with a review of all settlements and inclusion of an additional tier for larger infill settlements and smaller service villages giving capacity for small scale growth, where appropriate.</p> <p>Backwell should remain as a Service Village which should continue to be recognised as having the potential to accommodate “small-scale development” commensurate with the size of the village and the provision of services and infrastructure. The SDL proposal, due to its sheer size and associated infrastructure, would have a significantly negative effect on the village of Backwell and its immediate environs.</p>	
Banwell Parish Council	Banwell Parish Council	<p>Option 2 might suit Banwell better than the current designation as this may help spread the load of development outside the strategic locations. We do not agree with Option 3.</p>	
Barrow Gurney Parish Council	Barrow Gurney Parish Council	<p>We support the proposal to agree allocations within boundaries as set out in Option 1.</p>	
Blagdon PC	Blagdon Parish Council	<p>Blagdon sits squarely at the bottom of the current hierarchy with limited infrastructure and facilities and poor public transport links. There are no opportunities for large-scale development and even less desire for any.</p> <p>Overall, we would favour Option 1 - retention of the existing hierarchy. We would not support Option 3 where disadvantages far outweigh benefits. As far as Option 2 is concerned any impact would depend on what further development took place in and around Churchill and Wrington. Even then, access to services and facilities for those villages is limited and further development would place increasing strain on those.</p>	
Bleadon Parish Council		<p>This response was approved by Bleadon Parish Council at their meeting on 10th December 2018.</p> <p>Bleadon Parish Council (BPC) welcomes the opportunity to comment on the Issues and Options Consultation. BPC holds that the status of Bleadon as an Infill Village must be maintained throughout the next plan period to 2036. There are approximately 500 homes in the village; any development needs to be small-scale, appropriate to the needs of the village and within the existing settlement boundary. Roads through the village (Celtic Way, Shiplate Road and part of Coronation Road) are narrow and rural and do not have much, if any, additional capacity. There are minimal facilities and services within the</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>village, ie no school or medical practice; one general store, three pubs, one café; limited bus links to Weston. There is no safe or protected cycle route to Weston.</p> <p>Bleadon's Neighbourhood Development Plan area is the whole of the Parish of Bleadon and was designated in October 2017. The Neighbourhood Plan Group received a grant in October 2018 to progress the creation of the Plan. Comments received during discussions during 2017 and at the Annual Parish Meeting in April 2018 indicate that residents are keen to maintain Bleadon's status as an Infill Village with the settlement boundary unchanged.</p> <p>We prefer Option 1 (keep existing hierarchy but reassess the position of each settlement within the hierarchy) but would reaffirm the point that Bleadon's status as an Infill Village should remain.</p>	
British Horse Society	British Horse Society	In general, the BHS feels it would be better if new building is next to or close to available A roads which are capable of funnelling traffic safely away to wherever people are working. Several of the smaller towns have little in the way of employment and it is unrealistic to think that people will rely on a fragmented and expensive public transport system. They will use their cars.	
Brockley Parish Council	Brockley Parish Council	Brockley Parish Council prefers option 2 - An expanded hierarchy with an additional tier between Service and Infill Villages. The risk of residents not having access to services and facilities can be addressed at the planning stage.	
Burrington Parish Council	Burrington Parish Council	Settlement hierarchies are un realistic and inflexible. It ought to be possible to identify the opportunities and constraints in all the major settlements and to draft policies that are specific to that settlement, either in the local plan - in consultation with local people - or in a neighbourhood plan.	
C Twine		<p>Settlement Hierarchy</p> <p>4.18 The IOP considers there are three options for approaches to the settlement hierarchy:</p> <ol style="list-style-type: none"> 1. Retain existing but consider each settlement's position; 2. Creation of additional tier between Service and Infill villages; and 3. Growth based strategy. <p>4.19 In the absence of any detail, i.e. what the hierarchy would look like under each scenario, it is difficult at this stage to comment upon a preference. However, Winford should not be reclassified as anything lower than a Infill Village given the range of services and facilities.</p>	
Chris Butler		Why do we need to have a status, either communities are sustainable for growth or not. But by suppressing growth in larger 'service' villages, like cities the result is rural development at the cost of agricultural land. If services are not present, developers should fund and build key services first before housing this may control speculative applications on green field sites.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Chris Butler		Are NDPs just a government propaganda strategy to reduce cost of LPA planning appeals by convincing communities they need and have to build housing? Surely the LPA Local Plan should be good enough and not overridden by NPPF because of landbanking by developers? Again controlled population = less housing, less transport, less pollution, more food security	
Christopher Day		The 3 proposed options are equally flawed as they give no serious consideration to the strategic use of poor quality green belt land.	
Church Commissioners for England		The Commissioners consider that there should be flexibility within the emerging Local Plan to enable appropriate sustainable small scale development sites such as in Bleadon, across the whole of the Council's settlement hierarchy. This Policy is particularly restrictive for Infill Villages such as Bleadon and is preventing suitable, sustainable, high quality development from coming forward.	
Cleeve Parish Council	Cleeve Parish Council	CPC is a small infill village which has shared facilities with the service village of Yatton washed over by greenbelt. CPC support Option 1. The current hierarchy system is familiar and understood by communities and serves our community well. We recognise that in this Plan NSC is still looking for locations for further housing development. Identified in the Landscape Assessment and Strategic Housing Land Availability Interactive map, three sites of low sensitivity have been highlighted. We would point out that Cleeve is situated under the flight path and most of the village suffers from substantial noise from the airport day and night. Secondly, Cleeve is home to the Special Area of Conservation (SAC) for the Greater and Lesser Horseshoe Bat and is also close to the Brockley SAC. Thirdly one development site in the Plan is situated on rural lanes which are used for recreational pursuit such as walking, cycling and horse riding.	
Coln Residential (DLP Planning)		Coln Residential support the existing settlement hierarchy and the identification of Churchill as a Service Village. We understand the need to review the settlement hierarchy and potentially introduce a new tier of settlement, but would continue to stress the high relative sustainability of Churchill as an important Service Village. We would envisage that Churchill's role within the settlement hierarchy can only grow given current JSP proposals for Mendip Spring Garden Village.	
Congresbury Parish Council	Congresbury Parish Council	We would favour option 2 as Congresbury is a prime example of a 'larger' village than infill but not as big as many of the other service villages listed in the current definition. This option would allow small scale growth in small villages that could help them become more vibrant communities	

Respondent Name	Respondent Organisation	Comment	Attached documents
CPRE Avonside	CPRE Avonside, North Somerset District	The settlement hierarchy should be reviewed with current settlement boundaries retained. Sustainability is not always related to the size of the village but to public transport links and available services.	
Cresten		An accurate and up to date assessment of sustainability of each settlement is required, but recent experience of sustainability assessments is that firstly they are not accurate, and when inaccuracies are pointed out, no amendment is made.. Expanding the hierarchy seems an artificial way of justifying more development in already unsustainably developed locations. An overall strategy, developed in consultation with communities seems the best option. Currently the developers have the upper hand in promoting overlarge schemes for expensive housing with little or no community facilities to go with them in the location of their choice, so relying on planning policy to allocate appropriate levels of growth within a group of settlements housing within a group is not a sensible idea. An overall strategy for North Somerset, with the Council pro-actively involved in building genuinely affordable housing near communities according to their need, assessed in co-operation with the community would be far preferable to tinkering with heirarchies.	
D Yeates	Savills	<p>There are currently a range of settlements around the District, some of which fall within the Green Belt, which are suitable for small scale commensurate growth. Such opportunities for growth to meet the District's housing requirements and local housing needs, should not be precluded by overly restrictive planning policy.</p> <p>On the basis of the housing requirement set out in the JSP, we agree with the Consultation Document that the existing settlement hierarchy will need to be reviewed given that the JSP's housing requirement includes the identification of non-strategic sites to help deliver the target. We also agree that it is therefore important to re-assess the role and function of all settlements in the District to establish an up-to-date profile of their sustainability, capacity and constraints, particularly as circumstances will have changed since the adoption of the Core Strategy.</p> <p>In particular, we agree that there are likely to be a number of smaller settlements which may be able to contribute to sustainable development, but may not fit within the existing categories in the hierarchy. Backwell, and on a lesser scale Flax Bourton, are settlements which are capable of contributing to small scale commensurate growth alongside wider planned transport improvements to facilitate larger strategic growth at the SDL's.</p> <p>We therefore support a review of the existing settlement hierarchy, and of the options presented support both options 2 and 3 given that these provide flexibility for changing circumstances across the different settlements. Through a re-assessment of the role and function of the settlements, this is likely to conclude that some settlements, including Flax Bourton, should be considered as ranked higher than simply an 'infill village'. Ultimately, it is important that the Council's settlement hierarchy and proposed housing distribution meet the housing needs of both urban and rural communities.</p>	
D.Hayler		<p>Discussions of 'infrastructure' for infill villages are unrealistic. While removal of 'infill village' status and re-categorisation may ease the housing burden elsewhere and make NSC's job simpler, the truth of the matter is that many infill villages are suitable for little else other than infill.</p> <p>As an example, the 'windfall' of the UTAS site in Claverham recently was recognised and actively pursued in the Neighbourhood Plan because of the benefits of an injection of housing to Claverham, and to meet NS's requirements. However, it is unsupportable to suggest that Claverham (as an 'infill village' currently) would remain sustainable if there was to be the addition of either of two sites currently being put forward for consideration (HE 18200 or HE 18209) together with their additional 75 - 150 houses on top of the 77 planned for the UTAS site. The % increase in the scale of the village in terms of dwellings would simply be too great.</p> <p>If the decision is taken to add a third 'softer' category, there will be no turning back, and the temptation to further soften this by moving the middle category towards the Service village criteria for development is inevitable. Option 1 with the binary system of Service or Infill may have some</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>disadvantages, but it enforces decision-making based on the evidence available and removes the opportunity for political fudging and blurring the lines of accountability for planning decisions. This is the preferred option.</p> <p>It is important to recognise that comments and promises relating to infrastructure improvement are far easier to make than the evidence-base proves they are to deliver. Infrastructure typically lags many years behind residential development (if it ever happens), even more so where national considerations and government decisions are involved (irrespective of politically convenient promises).</p> <p>A focus on existing infrastructure, known improvements already in development and proximity to the actual employment and recreational markets the housing is supplying is critical. Framed in this way, required future development can be located where it is sustainable, meets the required needs and can be delivered with a positive impact on NS. Without this focus, NS will inevitably be tempted to ensure 'everyone gets a little bit' to thinly spread opposition, resulting in development which lacks the necessary infrastructure (possibly forever) and is therefore unsustainable.</p>	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	<p>Easton-in-Gordano/Pill is a service village and we would expect it to retain that status. Abbots Leigh is currently 'countryside' (albeit with a historical 'Village Fence') but is likely to become a settlement. Preliminary thinking on the Neighbourhood Plan suggests that there might be infill sites in both settlements but also small adjacent sites outside the settlement boundaries which could offer provision for some housing.</p> <p>We dislike the category of 'Infill Village' and suggest that the term 'settlement village' might be appropriate.</p>	
Ed Northcott	Mr	<p>You currently have a settlement "policy" to restrict major development to Weston, Clevedon, Portishead and Nailsea, with some small-scale development in some "service" villages. Basically, what you are saying is that operation of this "policy" stops you from building the number of houses you have to build, so now you have decided to throw out/change the policy so that you can build the houses in villages you previously said you were going to protect.</p> <p>It strikes me that you are reviewing the policy to make it fit the number of houses you have to build, rather than for the needs of the community. It makes a mockery of having a settlement "policy" at all.</p>	
EWH	Edward Ware Homes	<p>Settlement Hierarchy</p> <p>4.11 The IOP considers there are three options for approaches to the settlement hierarchy:</p> <ol style="list-style-type: none"> i. Retain existing but consider each settlement's position; ii. Creation of additional tier between Service and Infill villages; and iii. Growth based strategy. <p>4.12 In the absence of any detail, i.e. what the hierarchy would look like under each scenario, it is difficult at this stage to comment upon a preference. However, Churchill/Langford should not be reclassified as anything lower than a Service Village given the range of services and facilities.</p> <p>4.13 We suspect that if the Council continues with its current strategic development locations than Option 3 may be likely given the proximity of Backwell, Banwell, Sandford and Churchill/Langford.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
First Step Homes	First Step Homes (Wessex) Ltd	<p>The approach to Option 3 is supported. This allows for individual settlements to be flexible to accommodate additional growth, but still carefully considered through the Development Management process. There is a risk that some settlements within the District may become stagnated through lack of new development and investment resulting in increased chances of becoming unsustainable – see the study undertaken by the Country Land and Business Association (CLA) at the link below. As a result of this flexible approach and through carefully planned growth; settlements are likely to have greater support for existing services and facilities, which would further promote growth and demand to sustain them.</p> <p>https://www.cla.org.uk/sites/default/files/FINAL_CLA%20StrongFoundations%20Sustainable%20Villages%20lo%20res.pdf</p>	
Flax Bourton Parish Council	Flax Bourton PC	<ul style="list-style-type: none"> With the influence and limitations of the Green Belt, Areas of Outstanding Natural Beauty, Sites of Special Scientific Interest, Conservation Areas, Registered Parks and Gardens and Flood Plains in North Somerset, there is little scope for review and Option 1 is appropriate. 	
Gladman Developments Ltd	Gladman Developments	<p>4.3.5 The consultation document identifies that the existing settlement hierarchy will need to be reviewed, with over 1,000 dwellings (non-strategic sites) required to be identified to ensure the approximate 25,000 housing requirement is met over the 2018-2036 plan period. As part of this Plan it identifies that sites for allocation will be considered and the policy for allowing developments adjacent to settlement boundaries (see Policy CS32) will be reviewed.</p> <p>4.3.6 Whilst it is supported that the major settlements continue to play a key role in the accommodation of future development within the authority, this should not be at the expense of ensuring that the housing and employment needs of other settlements are met. Paragraph 77 of the revised Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is essential, therefore, that the needs of the sustainable rural settlements across the authority area are assessed and meaningful growth apportioned to them to ensure their ongoing vitality and viability. This issue has recently been highlighted by the CLA in their recent report which is covered below in Para 4.3.16.</p> <p>4.3.7 It is important to consider existing services and facilities in a settlement when assessing their suitability for accommodating new growth. Daily needs are particularly important with a primary school, shop and access to public transport being the key considerations. It must be recognised that there may be an ability, through new development, to improve some of these services and facilities, particularly access to public transport, that should be considered in any settlement hierarchy exercise as well as the role that new development can play in ensuring these facilities are maintained and are not lost because of a lack of support.</p> <p>4.3.8 Whilst it is recognised that some of these villages are small scale and consideration of the setting and character of the settlement is important, these issues must be balanced against the needs of the local community for new housing, including affordable housing and the need to ensure the long-term viability of the services and facilities within the village. It should also be recognised that increasing the number of sites across the authority with allocations for residential development will increase the rate of housing completions.</p> <p>4.3.9 The four Strategic Development Locations (SDLs) at Nailsea (2,675 new homes), Churchill (2,575 new homes), Banwell (1,900 new homes) and Backwell (700 new homes) plan to meet approximately 30% of the authority's housing need up to 2036.</p> <p>4.3.10 There is no discussion within the Issues and Options consultation about what tier (if any) the SDLs will be allocated to. Banwell and Churchill are currently designated as 'Service Villages' in the adopted Core Strategy hierarchy but large-scale developments of this size are that substantial that an additional tier with the settlement hierarchy is suggested by Gladman for the SDLs sites to be situated within.</p> <p>4.3.11 Gladman would suggest that a balanced approach is the most appropriate strategy for distributing development. Whilst we recognise that the authority's main urban areas should provide a focus for growth, continuation of the current development strategy through the new Local Plan is likely to result in insufficient</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>development being directed to the rural settlements in the authority. This will create a real risk that the continued vitality of these rural communities will be severely threatened.</p> <p>4.3.12 Gladman are supportive of a mix of Option 1 and Option 2. The settlement of Sandford is designated as an Infill Village but has taken significant growth since the adoption of the Core Strategy and therefore Gladman suggest that it should be re-designated in an additional tier between Service and Infill villages. There hasn't been much development at the other Infill villages over the course of the Core Strategy plan period to justify an additional tier between Service and Infill villages. Perhaps only Sandford could be included in this tier.</p> <p>4.3.13 Locking is designated as an Infill Village in the Core Strategy despite the Locking Parklands Strategic Urban Extension development which is well underway and under construction. Gladman are firmly of the opinion that the village of Locking should now be re-designated as a Service Village due to the wider local services and facilities which will be available within the village and SUE within the plan period.</p> <p>4.3.14 A recent report issued by the Countryside Landowners Association (CLA) concluded that 2,154 villages in England are missing out on new affordable homes because they are classified as unsuitable for growth by the local planning process.</p> <p>4.3.15 CLA has also analysed how 50 local authorities use a settlement hierarchy when deciding where new development will be allocated in a local plan. The hierarchy ranks villages by scoring them against a range of services and amenities but the CLA's research revealed that just 18% of local authorities factor in broadband when assessing the sustainability of rural settlements. These factors should therefore be considered by the Council when considering the level of growth to apportion to each of the settlements through the Local Plan Review.</p>	
Grassroots Planning	Grassroots Planning	<p>(housing): while we do not comment on the hierarchy of settlements, consideration should be given to ensuring any future policy wording clearly reflects the NPPF's support for rural exception sites. In particular paragraph 77 which states that "...local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help facilitate this".</p>	
GVA Grimley	GVA Grimley	<p>At this stage we have reservations about the practical implementation of the proposed options for the hierarchy given previous approaches by the Council to allocate or allow disproportionately high levels of residential developments in smaller lower tier settlements ahead of the larger towns identified in the hierarchy. Clevedon is a prime example of significant under provision compared to significantly smaller settlements such as Yatton.</p>	
Hallam Land Management Ltd (David Lock Assoc)		<p>HLM believe the current settlement hierarchy as defined in the current Core Strategy remains effective and sound, and thus Option 1 should be pursued (keeping the existing hierarchy). Furthermore, in order to ensure positive planning, HLM expect NSC to follow through in support of the hierarchy by directing sufficient housing and employment growth to Clevedon, through the allocation of land in accordance with its role as a Tier 2 settlement. The Land East of Clevedon presents an opportunity for housing and employment-led sustainable development at a scale appropriate to a Tier 2 settlement. Moreover it provides the opportunity for the NSC Local Plan 2036 to allocate high quality employment land adjacent to Junction 20 of the M5.</p>	
Hayes Family and Mr Cope		<p>5.15 We suggest that a blend of Options 1 and 2 should be considered for the next stage of the NLP Consultation. Some settlements should be re-assessed and moved further up the hierarchy to allow for smaller-scale growth to come forward, and an additional tier should be included between Service and Infill villages. This again would allow for smaller-scale growth to come forward in these settlements.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		5.16 We do not agree that Option 3 is an appropriate way to revise the settlement hierarchy as this could lead to more travel between smaller settlements to reach everyday facilities.	
Highways England	Highways England	<p>The I&OD sets out three options for reviewing the settlement hierarchy across North Somerset, noting that this is required to establish an up-to-date profile for settlements in terms of their sustainability, capacity and constraints for future housing delivery. Page 5 of 8</p> <p>Whilst Highways England has no explicit preference for any of the options presented, the hierarchy review should consider how travel demand, particularly car use, could be managed and reduced, the likely level of impact on the SRN and the ability to deliver necessary infrastructure improvements.</p>	
Hoddell Associates (Quinton)	Hoddell Associates	The settlement hierarchy is most likely to come into play with either the SDLs or the distribution of non-strategic growth; we think the latter will be particularly relevant in this respect. It will be the finally adopted JSP figure for housing need that will impact the most upon the scale of future growth and therefore the way in which the Council must look to accommodate same. Whilst options 1 and 2 seem to adapt the existing hierarchy and associated policies, option 3 could provide a criteria based guidance which would provide for greater flexibility. However, use of the term "...tightly worded..." seems potentially to indicate an unwillingness for such flexibility on the part of the Council.	
Home Builders Federation Ltd (S Green)	Home Builders Federation Ltd	The Council's spatial strategy, settlement hierarchy and distribution of development should be reviewed. The new Local Plan should provide sufficient opportunities to allow identified housing needs to be met in full by providing a clear framework that ensures policies in the Local Plan can be effectively applied. The Council should consider a revised settlement hierarchy that is as permissive as possible therefore the HBF consider a combination of the Council's 3 proposed options is the most flexible. It is important that the Council's settlement hierarchy and proposed housing distribution meet the housing needs of both urban and rural communities.	
Ian	Mr	Portishead has already grown massively in the last 20 years, with insufficient investment in employment and infrastructure. These problems need to be resolved before any further significant development in the town is considered.	
J Gower-Crane		<p><u>What is local housing growth?</u></p> <p>What about local requirements decided by local residents? Why compliance to non-strategic requirements especially as government and NSC have not put the infrastructure in place to deal with the increase? E.g. hospitals, doctors, care homes, schools, etc. whose need will only increase with the influx of new residents. More for requirement will arise for NSC and JSP after 2036? Continual growth cannot be sustained.</p> <p>Bleadon is visited by people from around the world with its 'quaint' English village surrounded by countryside, rivers, PROW, allotments, rivers and all the associated wildlife, as documented in books throughout the centuries (otters, badgers, kingfishers, water voles, etc.) Can Bleadon apply for protected 'quaint English parish status' now because with the rate of ongoing development required for NSC and JSP combined will destroy this community within the next generation.</p> <p>What about DEFRA's new November 2018 campaign with the statement "<i>improving the environment within a generation and leaving it in a better state than we found it</i>"</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>What about the rise in second homes bought in North Somerset, i.e. “almost one in every five homes sold last year in the area were to people who already had another property” as published in the Mercury 15 Oct 2018? How can NSC ensure that the new homes built will be for new people and not second homes?</p> <p><u>Where will the non-strategic sites be?</u></p> <p>Green Buffers and Strategic Gaps should be created for Bleadon to stop the urban sprawl from WSM, and the Settlement Boundary should be protected</p> <p><u>How will Neighbourhood Plans fit with the Local Plan?</u></p> <p>Clarity is needed between local Parish Council Neighbourhood Plans (NDP) & Parish Plans, district NSC Local Plans, regional Joint Spatial Plans (JSP) and Central Government directives, including those used by the Planning Inspector to seemingly override local and district decision making. Also, clarity between NSC Local Plan and associated SHLAA and local Parish Council allocations.</p> <p><u>3.1 Settlement hierarchy What is a settlement hierarchy?</u></p> <p>Hierarchy determines “... what role each settlement can play in addressing the future housing needs of the District...” Yet this proposed plan seems to be mainly accommodating regional aspirations. At what point does development stop, when we have no land, and no ability to produce food left?</p> <p><u>What is the existing hierarchy? Why does the existing hierarchy need to be reviewed?</u></p> <p>Why is there such a large SHLAA 'likely' allocation next to the current Bleadon Infill settlement boundary as it is not a town or service village?</p> <p><u>Why does the existing hierarchy need to be reviewed?</u></p> <p>NSC states that a review of the settlement hierarchy and boundaries is needed because of NSC’s involvement in the JSP. Who are these options for, the JSP or NSC including Bleadon’s undeclared needs? Like Bristol has a green gap every community should have one before they are no longer communities with their own identity and cultural practices.</p> <p>Settlements may have changed due to external development pressure not local need and so the review should not remove previous protections.</p> <p><u>What are the options for a new hierarchy?</u></p> <p><i>“Distribute the growth and reduce the pressure on towns and particularly service villages”</i> but this may increase the pressure on infill villages like Bleadon unnecessarily.</p>	
J Milward		<p>I support Option 3. This option allows more flexibility that would help to achieve small scale sustainable infill opportunities on the periphery of Backwell located in the Green Belt and outside the settlement boundary. This would remove the need for the more intrusive 700 home JSP proposal on the west of Backwell. It also allows for a more pragmatic approach to a wider choice of sites that is more likely to result in infill opportunities more acceptable to the local community.</p> <p>I note that the West of England Joint Spatial Plan (November 2017) seeks in Policy 5 - Place Shaping Principles to -</p> <p><i>“Create character, distinctiveness and sense of place which diversifies the residential offer, improves accessibility, affordability and enhances identity”.</i></p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>I also note that the North Somerset Council Core Strategy (Jan 2017) in Primary Objectives wants to –</p> <p>“Deliver sustainable housing development across North Somerset to meet housing needs”.</p> <p>I consider that Option 3 is more likely to achieve these JSP & Core Strategy aims.</p>	
Jan Murray	CALRAG	Settlement Hierarchies Totally inappropriate and unrealistic	
John Miners		<p>The hamlet of West End, currently assigned as a Town and part of Nailsea is wrongly classified in the heirachy. West End hamlet should be re-classified as Countryside when considering it's Settlement boundary. It is a farming community of 56 dwellings including 6 working farms and 6 liveries. The successful village pub Provides a central focus for that community. Geographically West End hamlet is 3 miles from the centre of Nailsea likewise 3 miles from the centre of Clevedon.</p>	
John Phillips Planning Consultancy	John Phillips Planning Consultancy	<p>We welcome the opportunity to comment upon the Councils review of Settlement Hierarchy which was a core theme in the Council's adopted Core Strategy which restricted housing development to certain villages and settlements with a wide variety of services and facilities. We believe that this previous approach has preventing alternative suitable sites in relatively sustainable locations from coming forward for development and that the hierarchy categories should be revised under Question 3 of the Issues and Options paper. Indeed, a number of housing schemes outside the accepted settlement boundaries have been allowed on appeal since 2016 which again demonstrates the need to review other more suitable locations for development and which can genuinely come forward for development within the early part of the New Local Plan period without the need for huge and costly infrastructure requirements and / or land ownership constraints.</p> <p>We believe that Option 1 which retains the existing Settlement Hierarchy is too restrictive and prevents future development form coming forward as has been demonstrated in the last 2 or 3 years. We would wish to see and support a hybrid between Option 2 and Option 3 whereby villages and hamlets nearby the Service Villages could take some additional level of development. This would have an advantage that local services would already be available relatively nearby and the proposed development could further assist in providing stability for the smaller villages and hamlets in such locations, particularly where redundant sites are readily available.</p> <p>We therefore put forward our client's land at Blackmoor, Langford, near Churchill in direct support of the Council's alternative Settlement Strategy Options 2 and 3 as above. Even though the plan is at an early stage in the process we believe this is a realistic opportunity given its position very close to Churchill with its much wider range of services which indeed itself has become a growth area for new housing given the various recent planning decisions for significant levels of housing provision both at appeal and by the Council.</p> <p>Land at former Blackmoor Farm, Blackmoor, Langford, near Churchill</p> <p>The land in question measures approximately 3.5 acres (1.4 hectares) and shown on the two accompanying plans (location and site plan) with its boundaries edged red. The site is set close to the heart of Langford with housing development existing on three sides to the north east and south. The land originally formed part of the much larger farm holding known as Blackmoor Farm of which the majority of the farm land to the west of the site was sold to the University of Bristol Veterinary College a number of years ago.</p> <p>The farm therefore became unviable as an agricultural unit and the site has remained redundant for a number of years. The site still retains a farmhouse close to its entrance which is currently vacant together with a small number of agricultural buildings in a poor state of repair.</p>	<p>John Phillips Blackmoor Farm Site Plan.pdf (356 KB)</p> <p>John Phillips Blackmoor Farm Location Plan.pdf (548 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The site is relatively flat throughout with current substandard access particularly upon exiting from the driveway given very limited vision to the south along Blackmoor. Any new housing proposal will need to incorporate an entirely new highway access along the site frontage with Blackmoor. Initial discussions with highway consultants have confirmed that a new access can be achieved to meet accepted highway standards.</p> <p>There appear to be no insurmountable site constraints to future development and we would suggest a possible scheme for between 20– 40 dwellings given current density requirements.</p> <p>The site is within easy walking distance of the settlement core which is centred around the junction of Blackmoor and Langford Road and relatively close to nearby Langford / Churchill. The site also benefits from the A5 bus service immediately adjacent to the site which links Winscombe / Yatton – Langford – Bristol Airport – and Winford.</p> <p>We have been instructed by our clients to make the following comments in respect of their land at Blackmoor, Langford near Churchill. Whilst we note that the Issues and Options paper is not intended to be a site specific document and indeed there will be further opportunities during the course of the new local plan process to further promote this land, we believe that the Council should be aware of its future potential for housing at this early stage in the process given the future level of housing provision needed in District as a result of the housing requirement figures stated in the Joint Strategic Plan (JSP) for the four Unitary Authorities which make up the West of England authority.</p> <p>Strategic context for new housing development in North Somerset</p> <p>Whilst the JSP has not yet been the subject of an Examination in Public (due to take place in spring / summer 2019), it nevertheless has been through a rigorous public consultation process and is well advanced, and therefore the policies and future distribution of intended housing is well understood. The key components within the JSP and further reiterated in the new local plan is the need for North Somerset Council to provide some 25,000 new homes in the period to 2036. The Council states that it has 13,900 dwellings as existing commitments either in the form of existing permissions or site allocations. This leaves a residual figure of 11,100 dwellings to find throughout the plan period. The vast majority of this residual figure is proposed as part of two large scale proposals at Nailsea/ Backwell (3,175), Banwell (1900) and Churchill (2675). These three proposals result either in new settlements or “bolt-ons” to existing settlements. By their very nature, the scale of proposed development is highly dependant upon huge level of new road infrastructure costs which the Council acknowledge will need to be funded from central government and clearly there is a high degree of uncertainty about such future funding levels. We have also made similar comments previously in other responses to the JSP proposals</p> <p>In addition to this uncertain future funding, such large- scale proposals will have significant lead in times and that is assuming that planning will be forthcoming in the plan period. Even for relatively minor schemes of say up to 200 dwellings the legal aspects of negotiations both CIL and Section 106 requirements post resolution to grant permission take anything between 12 and 24 months to complete. Indeed, the planning process for such complex developments will be subject to huge public opposition in those areas affected and will inevitably lead to delays in the process of such large- scale applications. All of these factors in isolation and combination will have a significant impact on the length of time that such schemes will come to fruition and we contend given the ongoing new local plan timescale and the discussion that will inevitably take place in the interim including the JSP Examination in Public and subsequent Local Plan Inquiry will result in many such large scale schemes not coming to fruition until the mid - 2020’s at the earliest.</p> <p>Housing Land Supply Position</p> <p>As part of its housing land requirement each local authority area throughout England and Wales must demonstrate an ongoing 5- year housing land supply. Any authority which cannot demonstrate the required land supply, is at risk of piecemeal housing development throughout its administrative boundaries as a result of appeal decisions in favour of the housebuilding and development industry. In the case of North Somerset, the latest available information which was recently tested at appeal (June 2018 ref APP/D0121/£/3184845 land at Weston Business Park, Laney’s Drove, Locking, Weston - super-Mare) where the Inspector concluded that the Council could only substantiate a 4.4-year housing land supply based on the evidence provided, and therefore allowed the appeal.</p>	

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		<p>Such development pressures will no doubt continue given this under provision and will lead, if allowed, to un planned development growth in unsustainable locations throughout North Somerset which is clearly contrary to the strategic growth policies contained within the adopted North Somerset Core Strategy and which provides the central core to the New Local Plan.</p> <p>Given the above two scenarios and the Council's apparent reluctance to undertake a strategic green belt boundary review in the northern parts of the District we foresee an ongoing under provision of housing land continuing for some considerable time with its consequences described above and we therefore contend that this initial stage in the new local plan process offers the opportunity to consider other suitable opportunities for sustainable development close to existing village settlement boundaries or non- strategic sites.</p> <p>Conclusion</p> <p>We therefore support the Councils proposals to improve the opportunity and supply the wide range of housing solutions given the ongoing inability to meet the rolling 5- year housing land supply position.</p> <p>It is clear however that we have severe reservations about the ability to bring forward the major strategic sites primarily at Nailsea/ Backwell and Churchill / Banwell given the associated level of highway infrastructure required which cannot alone be developer funded and clearly needs central government funding from the outset to have any creditable basis for kick starting new housing developments.</p> <p>Given the Councils apparent reluctance to undertake a comprehensive Green Belt review as part of an assessment to examine all potentially available sites there will be limited opportunities available to produce the numbers of housing required to meet the plan period to 2036. The Council are making certain assumptions in respect of windfall sites in their calculation but these may well diminish over the years and may not produce the numbers suggested.</p> <p>We welcome the Council's review through its Issues and Options paper to look at the wider potential options available to settlements within the rural areas. As stated, we support both Options 2 and 3 of the settlement options hierarchy.</p> <p>Finally, we wish to flag up our client's land as a site which has certain credentials in favour of future housing development and which we shall continue to promote throughout the various stages of the ongoing New local Plan 2036 process.</p>	
Kenn Parish Council	Kenn Parish Council	Option 1	
Lands Improvement		<p>SETTLEMENT HIERARCHY</p> <p>5.1 The consultation document highlights the need to review the settlement hierarchy by needing to address the new housing requirement as set by the JSP (not yet fixed). The Consultation document proposes three options:</p> <ul style="list-style-type: none"> • Option 1 – Keep the existing hierarchy but re-assess the position of each settlement within the hierarchy. • Option 2 – An expanded hierarchy with an additional tier between Service and Infill Villages. • Option 3 – Growth based strategy. Group together settlements with capacity for housing sites with a tightly worded criteria-based policy to guide where development will go. <p>5.2 We would favour Option 1 to retain the existing settlement hierarchy as it is our belief that this current arrangement is the most suitable.</p> <p>5.3 However, we would suggest it is not simply considering where within the hierarchy a settlement should sit, but also what levels of development are acceptable at such locations. We note that in the case of Service Villages a permissible approach to small scale development, of approximately 25</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>dwelling is allowed beyond settlement boundaries. However, this would not be available to those settlements whose boundary is constrained by the Green Belt. As a result, those villages have more limited options for growth, despite needing to grow in order to meet the community's needs, in particular affordable housing which will be delivered by allowing an appropriate level of market housing.</p> <p>5.4 We would suggest that any review of the hierarchy needs to be undertaken in association with a detailed review of planning constraints so as to ensure all communities have the ability to grow either through a permissible policy approach or by way of specific site allocations.</p>	
Lesley Hegarty		The current hierarchy should be maintained	
Long Ashton Parish Council	Long Ashton Parish Council	Option 1 is preferred for the reasons stated. A flexible approach is required.	
M Dos Santos		The approach to Option 3 is supported. This allows for individual settlements to be flexible to accommodate additional growth, but still carefully considered through the Development Management process. Sites such as the attached could deliver additional housing to support the sustainable growth of Portbury	207_NSC_LP_Response_Newlyn_FINAL.pdf (527 KB)
M Hayman		Support option 2.	
Mary Cradock		<p>Option 1 is preferable in my opinion. The existing hierarchy has a clear rationale in that growth is primarily directed toward settlements that have a greater provision of services and amenities in the first instance. Adding another tier would likely over-complicate the policy position in my view.</p> <p>My client's site is situated adjacent to Locking, which is currently classed as an 'Infill Village' in Policy CS33. CS33 allows for suitable smaller-scale developments to come forward subject to detailed considerations.</p>	
MBOYCE		The proposals seem to be detrimental to so many smaller outlying communities. It is imperative that smaller villages currently designated as "Infill villages" have their Parish Settlement Boundaries honoured. It is vital not to let in larger scale developments in these vulnerable areas by the back door. Unscrupulous developers can so easily destroy the charm and character of these villages so close to the larger conurbations of Bristol and Weston Super Mare.	
Mead Realisations Ltd		Page 21 of the Issues and Options document highlights the Adopted Core Strategies existing flexible approach to development which supports sites adjacent to the settlement boundaries of defined towns and villages. This approach is an important aspect of the policy framework enabling flexibility and ensuring that a suitable supply of housing can be maintained. It is not clear whether this policy has so far been effective. To assist the preparation of the new local plan the Council should provide evidence to demonstrate how many dwellings have so far been delivered through this policy and identify any barriers experienced.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Q8. What are your views on the options for a revised settlement hierarchy?</p> <p>2.27. A review of the contribution that smaller settlements can make is welcomed. A combination of all options should be applied to ensure that settlements are not unnecessarily constrained. For instance settlements that are located close to major towns, cities or where services are shared should be assessed on their own merits rather than simply grouped into a standardised hierarchy.</p> <p>2.28. North Somerset is constrained by both the green belt and AONB and has a history of under delivery which has led to affordability issues. If the plan is to be positively prepared it should ensure that it tackles this key issue by identifying sufficient land to address any shortfall in delivery in previous years and maintains the supply of housing in the future.</p>	
Moor Park (North Somerset) Ltd (MP)		<p>There are limited options for a revised settlement hierarchy in its upper tiers. The four towns (Weston-super-mare/Portishead/Clevedon/Nailsea) are unequivocally urban in scale, facilities and character compared with other settlements in the district that are both smaller and more rural. The review of the settlement hierarchy is therefore more relevant to the tiers beneath the four towns.</p> <p>Of more relevance to the towns than the tier in the hierarchy that they occupy is the potential for residential development at them. Other than Green Belt, no other development restraint designations should fetter the options for delivering development at the most sustainable settlements. This is particularly the case at Weston-super-Mare, which is the most sustainable settlement in the district.</p> <p>In her Examination of the North Somerset Site Allocations Plan, Inspector Burden alluded to the potential conflict of SG policies with the development strategy based on the settlement hierarchy, and ipso facto, with achieving sustainable development:</p> <p>... the Council identifies the boundaries of strategic gaps which are in many locations tightly drawn around the main settlements. As a result the strategic gap designation may limit the potential for new housing sites adjacent to the boundaries of a number of settlements.</p> <p>In these circumstances, the potential for new sites to come forward adjacent to settlement boundaries may be more limited than was intended by the CS Policies. ...</p> <p>Inspector Burden's conclusions on the SGs were as follows:</p> <p>There is no national policy for the provision of strategic gaps, or encouragement in Government policy to have such designations. In these circumstances the emerging JSP and new Local Plan would provide the opportunity for the Council to reconsider the principle of continuing with this designation.</p> <p>Inspector Burden's findings have been endorsed more recently (March 2018) by both the Secretary of State and his Inspectors elsewhere. The alignment of Strategic Gap policies with the provisions of the NPPF, and the weight to be given to them, was considered by the Secretary of State in connection with a conjoined Inquiry into three applications called-in for his own determination, and a recovered Appeal, at Crawley Down, East Sussex. Each of the sites was in a designated strategic gap.</p> <p>The Inspector acknowledged that the strategic gap boundaries were parasitic on the settlement boundaries, the latter of which had not been amended to take into account future housing needs. Moreover, it was apparent from the examination of the emerging Neighbourhood Plan that future housing development was expected outside existing settlement boundaries. The Inspector endorsed the findings of Inspector Burden in his conclusion that:</p> <p>... there is now no requirement in national planning guidance for the countryside to be protected for its own sake, as policy C1 seeks to do. Furthermore, the Framework does not contain any support for gap policies, whether of a strategic or a local level. Whilst one of the core planning principles set out in Framework paragraph 17 requires the intrinsic character and beauty of the countryside to be recognised, this is quite a different matter to the blanket</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>protection of the countryside by the aforementioned MSLP policies. With these points in mind, it is my conclusion that only limited weight can be given to MSLP policies C1 and C2.</p> <p>The Secretary of State concurred with the Inspector's conclusions cited above that only limited weight could be given to the policies that sought to protect the open countryside outside settlement boundaries and in the strategic gap (MSLP Policies C1 and C2 respectively).</p> <p>Similarly, in another recent, but separate, Appeal decision in West Sussex, relating to a site also included in a Strategic Gap, the Secretary of State concurred with his Inspector that, given the need for development outside settlement boundaries in the open countryside if the housing supply situation was to be improved, Development Plan policies constraining development (including those relating to the strategic gap) and not meeting the Framework's advice to significantly boost the supply of housing could only be given limited weight.</p> <p>The SGs conflict with the settlement strategy to focus the majority of development at the most sustainable settlements. In particular, at Weston-super-Mare they tightly constrain growth beyond existing limits. Given that they have no locus in current national policy, which has moved away from blanket protection of the countryside, they should be discontinued. A key issue for the settlement hierarchy and strategy is therefore to ensure that the SG policy that would conflict with its effectiveness, is discontinued. This is not identified as an issue, but it is not an option to continue with the designations, the effect of which is similar to Green Belt beyond the locations to which the latter applies, and which would place the plan in conflict with the NPPF.</p>	
Mr C Booy	-	<p>The consultation document considers that there may be smaller settlements capable of contributing to sustainable development that do not fit within the existing settlement hierarchy. Or to put it another way, their development would not be considered policy compliant despite their acceptability. As a result, a settlement hierarchy and settlement boundary review is proposed, which will include villages in the Green Belt such as Portbury (currently regarded as countryside, with no settlement boundary). We welcome this approach of considering an alteration to allow for small scale development in some settlements and we consider that the site proposed is a good example of why such alterations are necessary and beneficial.</p> <p>In terms of the options put forward, we consider that Option 1 should be disregarded as it removes the opportunity for the consideration of smaller settlements. Option 2 is deemed to be beneficial given that it would allow for small scale growth in sustainable villages. However, Option 3 is most preferential as it allows for a flexible approach, necessary to alleviate the current issue of inadequate housing provision. It is clear that previous methods of control are outdated and no longer suitable for purpose.</p> <p>We do not consider that Option 3 will result in the over-development of rural villages as sustainability can remain to be a consideration. Additionally, and as the consultation document sets out, settlements identified to have capacity for housing sites will be governed in line with a <i>"tightly worded criteria based policy to guide where development will go."</i></p> <p>The absence of settlement category constraints will most certainly be a step in the necessary direction in terms of addressing the inadequate amount of housing development to date.</p>	
N Cooper	Claverham Future	<p>Any revision to the terminology, will be viewed with extreme distrust. The way in which wording and policies have moved is ever weaker and ill defined to promote ease of development through lack of clarity. Frankly there is little to no trust amongst constituents that mealy mouth wording such as "up to 25 dwellings adjacent to settlement boundaries" will not destroy and weak faith that exists in clarity of decisions.</p>	
Nailsea		<p>If Option 2 was adopted with a caveat that smaller villages that could not access services in larger communities were excluded would seem to be best</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Nailsea Unit Trust (c/o Ellandi LLP)	Williams Gallagher	The existing hierarchy reflects the quality and range of services and infrastructure available within the defined towns and villages. The higher tier towns such as Nailsea should remain at the top of the hierarchy because they have the best infrastructure and service provision that can readily be adapted and extended to improve sustainability for the benefit of existing and future residents.	
Newcombe Estates Company Limited	Boyer planning	<p>Settlement Hierarchy (Question 8)</p> <p>3.15 It is considered that Option 3 (Growth based strategy) represents a positive and pragmatic approach to accommodating growth over the Plan period. In doing so this approach will allow for development opportunities to be considered based their individual merits and their capacity to deliver sustainable patterns of development assessed through the decision making process.</p> <p>3.16 Strict adherence to a hierarchy may artificially constrain the delivery of sustainable development simply because of a settlements position within the hierarchy, without any appropriate consideration of genuine development opportunities. A hierarchy by default implies a cap or restriction on development, either through an allowance to settlements within a specific tier in the hierarchy, or by way of a comparator with settlements which may be higher tier settlements, i.e. growth at a lower tier settlement should not exceed that of a higher tier settlement.</p> <p>3.17 The ‘Growth based strategy’ provides greater opportunities for the North Somerset Local Plan to implement a spatial strategy that is based on a range of sites in terms of location and size. In doing so, this has additional benefits in terms of providing greater flexibility in the overall supply of housing, by avoiding a scenario whereby a significant proportion of growth needs are focused on a small number of settlements/locations.</p>	
Newland Homes	.	<p>It is our opinion that there will be a need to deliver in excess of the 1,000-dwelling non-strategic growth allotment currently made for North Somerset. We agree that this level of growth should be steered to the most sustainable settlements within the District but acknowledge that the current Issues and Options document does not indicate where the Council intends to meet these needs.</p> <p>3.5 It is understood that the Council will seek to identify potential sites, using the SHLAA, as part of its preferred option document. Whilst we agree that this would be a suitable point at which to identify specific sites, we question whether the Council will have an appropriate evidence base to reach such a conclusion.</p> <p>3.6 The conclusions drawn as part of the SHLAA exercise to date focus on the existing policy framework and, as a result, sites outside of settlement boundaries, for example, are unlikely to score positively. We would therefore suggest that the Council needs to undertake a detailed review of the settlement boundaries, as discussed in more detail in response to Question 9 below.</p> <p>3.7 Our site (SHLAA reference HE1873) identifies the wider overall site capacity of 145 dwellings (benchmark) and is identified as a site ‘likely; to be suitable for development.</p> <p>3.8 Following work carried out in respect of landscape, highways and ecology there are no constraints restricting development of delivery of this site in the immediate future.</p> <p>3.9 The consultation document highlights the need to review the settlement hierarchy by needing to address the new housing requirement as set by the JSP (not yet fixed). The Consultation document proposes three options:</p> <ul style="list-style-type: none"> • Option 1 – Keep the existing hierarchy but re-assess the position of each settlement within the hierarchy. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • Option 2 – An expanded hierarchy with an additional tier between Service and Infill Villages. • Option 3 – Growth based strategy. Group together settlements with capacity for housing sites with a tightly worded criteria-based policy to guide where development will go. <p>3.10 We support Option 3.</p> <p>3.11 Although Claverham is defined as an ‘Infill Village’, its current settlement boundary immediately abuts that of Yatton, which is defined as a ‘Service Village’.</p> <p>3.12 Claverham is predominantly based around a ribbon pattern of development which extends along Claverham Road from Yatton High Street, with the effect that the settlements read as a single extended village.</p> <p>3.13 Whilst Claverhams facilities includes a primary school, village hall, post office, bar and coffee shop (housed in the village hall), playground, open space, church and hairdressers, the additional facilities and services of Yatton are also easily accessible from Claverham.</p> <p>3.14 Yatton Village Centre is a 3km cycle ride or walk along paved routes or accessible by the X2 bus and contains an array of facilities including a Library, supermarket, vet, cafes and restaurants, public house, sports clubs, shopping mall and nursery pre-school. Yatton also has a train station with connection to and from local centres and other locations further afield including Bristol, Gloucester, Cardiff and Taunton, which greatly improves the sustainability of the location because of the potential for commuting by non-car modes. The current categorisation of Claverham fails to take this into account.</p> <p>3.15 Upgrading the position of Claverham within the settlement hierarchy as part of a combined settlement with Yatton, allows the new plan to lend it further support as a location for the delivery of non-strategic growth, which we have identified as a critical area to address.</p>	
Newland Homes		<p>4.1.18 Page 21 notes the adopted Core Strategies flexible approach to sustainable development which supports the development of sites adjacent to the settlement boundaries of defined towns and villages (Policy CS28 and CS32 of the adopted CS). This approach is considered to be an important aspect of the policy framework enabling flexibility and ensuring that a suitable supply of housing is maintained. It is not clear whether this policy has so far been effective and to assist the Council should provide evidence to explain how many dwellings have so far been delivered through this policy and identify any barriers experienced.</p> <p>4.1.19 A combination of all options should be applied to ensure that settlements are not unnecessarily constrained. For instance settlements that are located close to major towns, cities or where services are shared should be assessed on their own merits rather than simply grouped into a standardised hierarchy.</p> <p>4.1.20 North Somerset is constrained by both the green belt and an AONB and has a history of under delivery which has led to affordability issues. If the plan is to be positively prepared it should ensure that it tackles this key issue by identifying sufficient land to address any shortfall in delivery in previous years and maintain deliver rates in the future.</p> <p>4.1.21 It is noted Table 1 identifies Banwell as a ‘Service Village’ which is second in the existing settlement hierarchy in North Somerset behind the ‘Towns’. Up to date evidence is yet to be provided on the sustainability of each settlement but it is considered Banwell is one of the more sustainable Service Villages in North Somerset that is capable of accommodating additional development.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Nigel Bennett (Magenta)	Magenta Planning	<p>The JSP sets out that 1,000 new homes will need to be allocated in North Somerset to meet requirements for ‘non-strategic’ growth. This may be an under estimate, but is broadly in line with the new NPPF requirement for the provision of small sites (ie. for 10% of all sites identified for housing in Local Plans to be of 1ha or less). The site specific opportunity at Cleeve (as an ‘infill village’) would be a prime candidate for this category, with no particular constraints to development and only benefits flowing to the quantity and quality of the local housing stock as a result.</p> <p>In line with the previous Local Plan Inspector’s direction for the Council to draw on a ‘wider choice of sites’, such villages should now play a significant role in shaping the Council’s spatial strategy for the new Local Plan to deliver sustainable growth. This is acknowledged by the Council and will complement their longer term major urban projects (such as at Weston-super-Mare), helping to deliver a more dispersed and proportionate distribution of development across the district. Furthermore, the approach will help to provide a supply of ‘oven ready’ sites for delivery in the short term (within 5 years), such as the subject site which will both enhance the long term sustainability of the village and help towards ensuring that a mixed and balanced community is maintained.</p> <p>The importance of the short term housing supply situation was highlighted relatively recently by a Planning Appeal Inspector (Mr Paul Singleton BSc Hons MA MRTPI) concerning an allowed scheme for 59 homes by Redcliffe Homes at Cox Green, Wrington (Appeal Ref:- APP/D0121/W/16/3166147; dated 23rd November 2017).</p> <p>Paragraph 12 of this decision notice reads:- ‘The Council is unable to demonstrate a 5 year housing land supply (HLS) as required by paragraph 47 of the NPPF (Framework) and, in accordance with paragraph 49 of the Framework, the relevant development plan policies for the supply of housing should not be considered up-to-date. The settlement boundaries for Wrington and other villages, which have been carried forward from a Replacement Local Plan adopted in 2007, were established in the context of a housing requirement to 2011 only and are not the product of a full and objective assessment of housing needs as required by paragraph 47 of the Framework. The Council and appellant agree that these boundaries are time expired and are not up-to-date’.</p> <p>We would wish to highlight that the same broad locational circumstances apply at Cleeve, since similar to the Wrington site, there is good access to a range of services and facilities, and it represents a sustainable edge of village location for development.</p> <p>In terms of the options put forward by the Council for a new hierarchy, either option 1 or 2 is feasible, providing the associated re-assessment of boundaries is comprehensive and that appropriate site specific opportunities are identified as new allocations. In terms of option 2, we would contend that Cleeve, as a sustainable infill village, would fit into the potential new tier of settlements referred to.</p>	
Pegasus (D Millward)	Pegasus Group	<p>Settlement Hierarchy (page 20)</p> <p>2.20 The IOP considers there are three options for approaches to the settlement hierarchy:</p> <ol style="list-style-type: none"> 1. Retain existing but consider each settlement’s position; 2. Creation of additional tier between Service and Infill villages; and 3. Growth based strategy. <p>2.21 In the absence of any detail, i.e. what the hierarchy would look like under each scenario, it is difficult at this stage to comment upon a preference.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>Due to the failure of planning policies in the past to plan for the housing needs for North Somerset and the inability of the Council to be able to demonstrate a 5 year housing supply, the settlement hierarchy has been completely undermined by development management and appeal decisions. This is compounded by the emerging proposals in the JSP and the Local Plan which identify only 1,500 new dwellings in Weston-super-Mare, but 2,575 in one of the three towns and 5,275 in three service villages. Whilst the settlement hierarchy identifies the overall role of each settlement, it is clear that it has not formed the basis for addressing future housing needs of the district and the most sustainable way to distribute the non-strategic housing growth over the plan period. The issue then is how to define a settlement hierarchy which reflects the development proposals of the plan if all the development is delivered by the end of the plan period.</p> <p>In view of the above we do not consider option 1 (to retain the existing hierarchy) and option 2 (an additional tier between Service and Infill Villages) are realistic and therefore we support option 3 for a growth based strategy to include a criteria based policy to guide development. The advantages set out are all important considerations in that this option provides flexibility, it reduces the possibility of <u>all</u> settlements stagnating, not just smaller villages, and offers choice and opportunity to accommodate appropriate levels of growth in all settlements. However, the wording of the new hierarchy/policy is vital to ensure that it delivers on the above but also addresses the identified disadvantages by introducing suitable policy triggers/controls to ensure appropriate levels of development at villages with limited facilities thereby avoiding over-development at smaller settlements.</p> <p><u>Local Housing Growth</u></p> <p>Whilst the submitted JSP sets out the need for 1,000 homes to meet non-strategic growth in North Somerset, in commenting on the JSP we consider housing needs in the West of England and North Somerset have been underestimated.</p> <p>This view is also supported by substantial evidence submitted by others, which points to an OAHN for the West of England substantially above 102,200 dwellings, with 25,000 in North Somerset, resulting from low economic growth assumptions and an inadequate response to improving housing affordability, contrary to government policy. We also note that even the government's aggregated assessment for the four West of England authorities using the standard methodology identifies a figure of 116,500 (26,160 for North Somerset), which itself includes no uplift to take account of economic growth in accordance with the West of England LEP Strategic Economic Growth Plan and beyond.</p> <p>If following the examination of the JSP that proves to be the case, then we consider that in order to ensure delivery of sufficient housing numbers, the numbers required from non-strategic sites in a broader range of locations will be required. We agree that the settlement hierarchy and settlement boundaries are two planning tools that should help decide where new housing will go.</p> <p>In the light of this and notwithstanding previous consideration of the site, PHSV consider the new Local Plan provides the opportunity to reconsider Farleigh Fields, Backwell in the context of a Local Plan Review rather than through the development management process. The site offers the following benefits:</p> <ul style="list-style-type: none"> • It is sustainable, close to a range of facilities and within walking distance of Nailsea and Backwell Station; • It can meet housing needs in the short-term to bridge the gap between the requirement the strategic development location and its consequent infrastructure requirements coming forward; • However the settlement hierarchy is constructed, Backwell remains the most sustainable service village in North Somerset; • The site does not extend the general extent of the built up area of the village; • Development of the northern flatter part of the land adjacent to existing houses on Farleigh Road enables the retention of the majority of the site as open space to address landscape and heritage issues; • The site is available and deliverable <p><u>Farleigh Fields, Backwell</u></p>	<p>R2400_500_003_E_Site_Plan_A3.pdf (2.3 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Notwithstanding consideration of land at Farleigh Fields, Backwell through both the development plan and development management processes the preparation of a new Local Plan provides the opportunity to view the potential of the land in respect of current and changed circumstances. It is important to consider the site, particularly in respect of the emerging West of England JSP and the appeal decision on the most recent planning application for 220 dwellings.</p> <p>Of particular relevance is the context provided by emerging JSP Policy 7.4, which proposes 700 dwellings west of Backwell, because the planning application was refused on the basis that 220 dwellings were not at a level appropriate to the scale of the existing village and would be out of keeping with the overall character of the village and its landscape setting. Clearly that conclusion has now been overtaken by events and needs to be assessed in the light of the emerging JSP policy for Backwell, both in respect of scale and location. This view was also supported by the Inspector into the planning application appeal who said <i>‘nor am I persuaded by the evidence . . . that the scale of development proposed would necessarily be disproportionate to the existing settlement or that, as a matter of principle, it would have a significant effect in terms of community cohesion.’</i> In addition, the reliance on conflicts with the Backwell Neighbourhood Plan ceases to be relevant in the context of the new Strategic Planning Policy and Local Plan Review which will both post-date the Neighbourhood Plan.</p> <p>i) Scale</p> <p>Whilst the planning application was eventually refused for 220 dwellings, that number evolved through discussions with the Local Planning Authority initial work on the application identified a development envelope capable of accommodating up to 500 dwellings without significant impacts on issues of acknowledged importance. The original application submitted for 340 dwellings on a reduced footprint on the basis of an assessment of the housing needs at that time. However, following discussions with the Local Planning Authority and in response to other consultation responses, the application was revised to include 220 dwellings to better reflect the character of the village. On the basis of the emerging JSP proposals, it is clearly appropriate to reassess the development potential and scale of development at Farleigh Fields and the contribution it can make to meeting the Local Plan non-strategic housing requirements.</p> <p>ii) Character and Appearance</p> <p>The appeal Inspector also provided some important conclusions on landscape and character and appearance (IR344):</p> <ol style="list-style-type: none"> 1. <i>‘NSC’s concerns in this regard relate to a large extent to matters of character and appearance rather than landscape impact as such’.</i> 2. <i>‘The site is reasonably self-contained in large part due to the screening effect of the existing development that surrounds it as well as to an extent by planting and topography’</i> 3. <i>‘For this reason, combined with the proposed location of the proposed houses and associated works to the lower lying parts of the site, and subject to careful consideration of the matters that would be reserved for future consideration, the appeal scheme would have a very limited effect on the character and appearance of the area beyond the immediate area. Indeed any such effects would be largely limited to within the site itself’ (our emphasis).</i> <p>In addition the Inspector recognised the development would only have local impacts (IR346 <i>‘in short the site is important locally . . .’</i>) and <i>‘cannot be said to display the characteristics necessary for it to be a “valued landscape” in terms of the framework’</i> (IR347).</p> <p>iii) Location</p> <p>Backwell (together with Nailsea) is identified as an appropriate location for strategic development in the JSP. Specifically development is to take place to the west of Nailsea and Backwell because it would avoid Green Belt and flood issues. Backwell is also identified as a service village in the adopted Core Strategy and is one of the larger service villages with a range of services and facilities including, unusually, a secondary school and swimming pool and access to a mainline railway station.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>North Somerset carried out a comparative assessment of rural settlements as evidence for the now adopted Site Allocations Plan in the ‘<i>Assessing the sustainability and settlement hierarchy of rural settlements in North Somerset</i>’ February 2016 and in the separate executive summary document October 2016. Each settlement was assessed against eight components and scored according to a RAG rating which showed that Backwell was assessed as being the most sustainable service village in North Somerset, by some margin. That evidence remains relevant now and therefore Backwell is an appropriate location for deliverable non-strategic development providing a buffer to enable the delivery of strategic infrastructure necessary for the development of the proposed SDL’s at Nailsea and Backwell.</p> <p>Farleigh Fields is outside the Green Belt and the principal flooding areas and the officer’s delegated report on the previous application concluded that ‘<i>subject to the appropriate conditions in Section 106 contribution, there is no transport or highway objection to the proposal.</i>’ In addition the area proposed in the JSP is located in an open agricultural landscape outside the village settlement boundary. In comparison Farleigh Fields is entirely enclosed by existing development and within walking distance of the village centre and is owned outright by PHSV.</p> <p>Farleigh Fields can therefore deliver housing early in the plan period and should be allocated as non-strategic development in addition to the land at west Backwell.</p> <p>A site location plan showing the extent of Persimmon Homes land ownership at the Farleigh Fields site is attached.</p> <p>iv) Local Green Space</p> <p>Two fields have been designated as Local Green Space in the adopted Site Allocations Plan to recognise their importance in terms of the setting of St Andrew’s Church and the views afforded to it from the Public Right of Way which crosses the field. As demonstrated in the 2015 planning application, these fields and indeed a greater area, can be retained as open green space as part of any allocation for development.</p>	
Portishead Town Council	Portishead Town Council	Agree with Option 1	
Puxton Parish Council	Puxton PC	Nowhere within North Somerset should be excluded from the North Somerset hierarchical map. Everywhere counts. Everywhere matters, both to those living and working there, and within the total North Somerset community context. Without a hierarchy slot for each of the presently excluded areas, those areas will have no capacity to exercise any community ‘flex’ - however minimal – over another long stretch into the future. Recognition of and provisioning for the needs of that future should be signalled within the proposed hierarchy restructuring.	
Rocke Associates on behalf of Mactaggart and Mickel Homes Ltd	Rocke Associates	<p>There are limited options for a revised settlement hierarchy in its upper tiers. The four towns (Weston-super-Mare/Portishead/Clevedon/Nailsea) are unequivocally urban in scale, facilities and character compared with other settlements in the district that are both smaller and more rural. The review of the settlement hierarchy is therefore more relevant to the tiers beneath the four towns.</p> <p>Of more relevance to the towns than the tier in the hierarchy that they occupy is the potential for residential development at them. In this respect there is a significant difference between the three second-tier towns given that Clevedon is substantially constrained by Green Belt, which in North Somerset the JSP indicates it is not necessary to adjust, and Portishead already has substantial housing commitments and has accommodated substantial recent growth. The focus for growth is therefore correctly on Nailsea given its lack of significant housing growth for several decades, and also its greater potential for travel by sustainable modes given its proximity to a railway station.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Simon Hegarty		The current hierarchy should be maintained	
South Bristol Business (M. Knight)	South Bristol Business	SBB supports the Council view stated that Development should be generally be accommodated in settlements where the need to travel can be reduced through good access facilities and services without adverse impacts. Not surprisingly, as private business representatives we support Council Option 3 – a Growth based economic strategy across the Council area in order to positively address an inherently weak financial operating District Council structure. South Bristol Business take the view that Housing and Jobs are of equal importance and priority. We therefore take Employment/Business Creation first.	
South West Strategic Developments (SWSD)		<p>POTENTIAL RESIDENTIAL SITE – EXTENSION TO PREVIOUSLY APPROVED SITE KNOWN AS ‘LAND NORTH OF OLD MIXON ROAD’ (REF: 16/P/0150/O)</p> <p>Settlement Hierarchy Firstly, we note the development hierarchy’s focus on the settlement of Weston-super-Mare and agree with this focus. As it is the main town in the area and provides extensive services, facilities and jobs it is only right that it should be one of the main focus points for housing growth. We also agree in principle with the proposal to attempt to provide additional housing numbers through the intensification of existing committed sites and through the provision of additional housing on the edge of Weston-super-Mare, which is currently supported by adopted policy CS28 which allows sites of up to 75 units to come forward where they lie adjacent to the previously established settlement boundary. However, we don’t agree with the quantum applied to the Urban Living supply as there is little or no evidence to suggest this is a credible and robust figure as we have explained in separate representations. We strongly recommend that this policy, and the flexibility it provides, be replicated in the new Local Plan. It provides flexibility in land supply to allow sustainably located sites to come forward and help the council address its historic under delivery and provide additional housing land supply which is desperately needed in the area. It is therefore essential this policy be retained.</p> <p>Therefore, in respect to section 3.2 of the consultation document we propose option 1 is pursued: Include new allocations within the boundaries and retain policy allowing sites to come forward adjacent to the boundary. Option 2 is only realistic if new sites outside of the current boundaries are specifically allocated for development. If such an approach is taken we propose that the land outlined in the plan contained as appendix 1 to this letter be allocated for residential use.</p>	<p>South West Strategic Developments Appendix 1 - 161206 13191 1000D Redline Plan.pdf (3.7 MB) South West Strategic Developments Appendix 2 - 13191 3001E Illustrative Framework Plan.pdf (6.3 MB)</p>
Strongvox Homes	Strongvox Homes	<p>Strongvox Homes supports Option 2. Whilst the Service Villages are more obvious locations for growth, there are a number of settlements that are currently defined as Infill Villages that are capable of accommodating growth - for example, Sanford. Clearly any scope for the growth of existing Infill Villages must be commensurate with the size of the village - meaning that not all Infill Villages will be suitable to move into a new tier between Service and Infill Villages.</p> <p>In relation to Neighbourhood Plans, these documents should be in conformity with the Local Plan. It is therefore expected some elements of Neighbourhood Plans may become out of date as the Local Plan progresses and further weight is given to emerging Local Plan policy.</p>	
Taylor Wimpey - Turley Associates	Turley Associates Ltd	Yatton’s position as a higher order settlement is supported. It is also acknowledged that it is appropriate for the hierarchy to be reviewed to ensure growth is directed to the most sustainable areas whilst not stagnating appropriate growth at lower order settlements.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Tom Leimdorfer		In principle, I would support Option 3 as it has the potential for more a flexible plan-led approach. There are locations in smaller villages where some small scale development would be beneficial to the community. It is also an anomaly that farm buildings can be converted to dwellings almost anywhere, while some well-designed and sustainable housing in suitable small village locations ruled out. However, the key wording is 'tightly worded criteria-based' policy which would stand up to challenge and appeal by developers trying to exploit loopholes.	
Viv Tomkinson	Congresbury Residents Association Group	Retain existing hierarchy. Option 3 is completely unacceptable.	
Waddleton Park Limited (Savills)	Waddleton Park Limited	<p>All settlements have a role in supporting sustainable development in a manner commensurate with their scale and range of services and facilities on offer – and we support the Consultation Document’s reference that growth of settlements will depend on a number of factors, including existing size, capacity and accessibility. The Consultation Document confirms that settlements currently outside the Core Strategy’s existing categories of settlements suitable for housing growth may provide opportunities to deliver sustainable development.</p> <p>We support this position – noting that a number of planning decisions have confirmed that the current spatial hierarchy, which precludes development within Infill Villages, doesn’t allow for sustainable development; with a number of larger scale housing sites being granted planning consent at planning appeal within Infill Villages.</p> <p>In terms of the options identified within the Consultation Document, we would suggest a mixture of option 2 and 3 would deliver the most appropriate local strategy, and ensure the delivery of sustainable growth over the plan period.</p> <p>There are a diverse range of villages within North Somerset, and the current settlement hierarchy does not reflect this. Option 2 provides this opportunity; enabling communities which can support sustainable growth to be identified, and provide a more appropriate framework for local planning decisions. This will also enable the nLP to reflect the current planning policy context, in regard to national planning policy and also to reflect the recent approach taken by planning inspectors within North Somerset. As discussed above, this recognition can go beyond housing, to consider the wider role of these settlements, for example in providing neighbourhood services and facilities.</p> <p>We note that a negative is identified in regard to this approach – being that the option assumes that residents within smaller villages can easily access services and facilities in neighbouring larger settlements. In this regard, we reference our comments above to the draft SA, and the fact that accessibility in rural areas, as set out in national planning policy, should reflect the varying opportunities for sustainable travel.</p> <p>Our comments above to the emerging Sustainability Objectives suggest that a broader approach to ‘accessibility’ should be taken, and that through acknowledging the varying roles of walking, cycling, public transport and use of private vehicles in more rural locations, that an appropriate spatial strategy can be delivered. This will negate this disadvantage in practice and ensure that the spatial strategy accords with national planning policy.</p> <p>Section 2 of this Representation has raised a concern in regard to the deliverability of the proposed housing trajectory, and notes the implications that this will have on housing land supply in the short-medium term, and throughout the plan period. Option 3 of the Consultation Document provides an opportunity for North Somerset to proactively address this potential shortfall, and provide a framework for sustainable development to come forward over the plan period; for example where a 5YHLS cannot be demonstrated, and where new opportunities are presented.</p> <p>In this regard, we suggest that a criteria based policy would also be appropriate to enable sustainable development to come forward over the plan period to respond to new opportunities for growth, and also to provide a pragmatic solution to respond to shortfalls in housing land supply.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Sandford</p> <p>The village of Sandford falls to the north of the Mendip Hills AONB, and is classified as a 'Central Parish' within the Consultation Document.</p> <p>Sandford benefits from a number of services and facilities; including a primary school, convenience store, meeting room, and pub; alongside a range of social/community groups. There are also several other businesses in the village providing a wider range of services and facilities. In line with the findings of the CLA Report, referenced above, Sandford forms part of a cluster, with further services and facilities accessible in neighbouring villages, including Winscombe, Churchill and Banwell. The village itself benefits from a relatively significant number of employment opportunities given its size, with over 400 jobs within the village.</p> <p>Sandford is located on a bus route between Weston-Super-Mare and Wells; and in addition is supported by bus services to Bristol Airport, and a number of school/college buses. The services meet the frequency requirements set out for rural areas within the SA (Objective 3.2).</p> <p>The sustainability of Sandford as a location for growth has been considered by the Planning Inspectorate, under APP/15/3139633, which confirmed that the village was a suitable location for growth of a greater scale than that permitted by the adopted Core Strategy. This has followed through into local planning, with Officers' recommending the approval of another planning application in the village (17/P/0887/O) on this basis.</p> <p>In line with our comments above in relation to the settlement hierarchy, Sandford represents a sustainable location for local growth within North Somerset – responding to the NPPF's recognition that all settlements have a role to play in supporting sustainable development. There are a range of services and facilities, and employment opportunities, within walking/cycling distance of the village, and there are opportunities for sustainable transport modes to be taken up.</p> <p>Land South of Greenhill Road is an opportunity to deliver residential development to meet the housing needs of North Somerset over the plan period, and represents a suitable, available and deliverable site. We would welcome the opportunity to discuss this site further with North Somerset Council.</p>	
Wainhomes		<p>2.11. Page 21 of the Issues and Options document highlights the Adopted Core Strategies existing flexible approach to development which supports sites adjacent to the settlement boundaries of defined towns and villages. This approach is an important aspect of the policy framework enabling flexibility and ensuring that a suitable supply of housing can be maintained. It is not clear whether this policy has so far been effective. To assist the preparation of the new local plan the Council should provide evidence to demonstrate how many dwellings have so far been delivered through this policy and identify any barriers experienced.</p> <p>2.12. A review of the contribution that smaller settlements can make is welcomed. A combination of all options should be applied to ensure that settlements are not unnecessarily constrained. For instance settlements that are located close to major towns, cities or where services are shared should be assessed on their own merits rather than simply grouped into a standardised hierarchy. Smaller settlements which are located close to other settlements where services are shared should be considered suitable for development.</p> <p>2.13. North Somerset is constrained by both the green belt and AONB and has a history of under delivery which has led to affordability issues. If the plan is to be positively prepared it should ensure that it tackles this key issue by identifying sufficient land to address any shortfall in delivery in previous years and maintains the supply of housing in the future.</p>	
WENP	West of England Nature Partnership	<p>We suggest that sustainable modes of development are prioritised, while providing appropriate policy to enable those who wish to sustainably work on the land, for example as smallholders or in sustainable food production or forestry, to self-build (ref Wales).</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	Whilst many residents in the villages of Wraxall and Failand can easily access services and facilities through private transport, there are residents that rely on the local bus service, particularly the elderly who are less able and those in social housing in the village of Wraxall. Thus Options 2 and 3 would disadvantage those residents. Our preference is to retain the policies in The Core Strategy and its supporting documents that have served our communities well.	
Wrington Parish Council	Wrington Parish Council	No meaningful comment at this stage. However there may be value in initiating a further category of hierarchy to enable better, more precise definition of settlement categories.	
Wrington Village Alliance		Settlement hierarchy - we support Option 2 because the current four levels in the hierarchy are insufficient to properly reflect the different characteristics of villages	
wwarden		<p>The existing allocations are flawed, although this is in part because the criteria have been relaxed since the concept of Service Villages was first introduced.</p> <p>For example, Wrington does not provide services for any larger catchment, certainly not a 'much wider catchment'. It's because the facilities are no longer available in the village, however it might appear to the casual observer, and access is poor by both road and public transport.</p> <p>I note the need to balance the requirements of development (although it should perhaps be aspirations rather than needs or requirements) against sustainability and environmental issues, but sustainability is a vital factor according to the NPPF. On reflection, I would support Option 2.</p>	

Document Part Name

Q9. What are your views on the options for revised settlement boundaries?

Respondent Name	Respondent Organisation	Comment	Attached documents
A Mathison		<p>Settlement boundaries need to be rigorously maintained to avoid North Somerset villages merging.</p> <p>It should be possible to prevent ad hoc, inappropriate development of greenfield sites/countryside.</p> <p>It should be possible to preserve the character of individual villages. Indeed North Somerset Council's own Landscape Character Supplementary guidelines supports this view.</p> <p>People should be encouraged to walk or cycle to work. There is very little possibility of these with the current proposals.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Abbots Leigh Parish Council		<p>There are anomalies for Easton/Pill in that significant development at Ham Green is currently outside the settlement boundary but within the Green Belt. We think this anomaly should be removed and the boundary adjusted. A boundary should be established for Abbots Leigh – drawn so as to recognise the historic Village Fence.</p> <p>Our view is that adjusting boundaries to include new allocations within existing boundaries is likely to limit the degree to which sites can come forward to meet local need (e.g. affordable housing to meet local need or smaller housing for older residents). Keeping boundaries tightly defined prevents speculative development and allows the Neighbourhood Plan and the subsequent planning process to influence the size, tenure and design of exceptional new housing in the Green Belt. We believe that in all four sub-areas of our NPA (Easton, Pill, Ham Green and Abbots Leigh) there are a few small sites both within existing boundaries and adjacent to existing (if adjusted) boundaries. There may thus be scope for infill development within settlements but also for modest new development in the Green Belt on appropriate adjacent sites. We strongly oppose the adjustment of boundaries which would permit major new Green belt development.</p> <p>Our choice of options as far as our area is concerned therefore are:</p> <ul style="list-style-type: none"> • Adjust settlement boundaries to reflect recent development (Easton/Pill) and the need for a formal boundary (Abbots Leigh), • Retain these boundaries without providing new allocations within the settlements • Allow sites to come forward adjacent to the boundaries 	
Alex		<p>Settlement boundaries should be maintained to preserve the character of each village, except in exceptional circumstances (eg The Doctors' surgery between Yatton and Congresbury) . North Somerset Council's own Landscape Character Supplementary guidelines supports this view. Villages should not in any case be expanded without PRIOR provision for employment and facilities or effective public transport hubs within walking or cycling distance.</p>	
Alice Barratt		<p>In relation to question 9, settlement boundaries:</p> <p>Settlement boundaries need to be rigorously maintained to avoid North Somerset villages merging together. To stop the county turning into one big ugly urban sprawl. The original and character features of each individual village will be lost if development is aloud to happen outside the boundaries. The North Somerset councils own landscape character supplementary guidelines supports this view.</p> <p>It will turn from a rural county to an urban county.</p>	
Aston	Aston and Co UK	<p>Option 1, Adjust Settlement Boundaries to include allocations and retain current policy – We agree and support this proposal. Forward plans for 20 years need to retain flexibility to deliver housing. Allocating housing adjacent the existing large towns with established services needs to be prioritised. It remains the most sustainable and most rapid solution to 5-year housing land shortfall.</p> <p>Opportunity to adjust the existing settlement boundaries should be focused upon ahead of any new garden village.</p>	
B Moss		<p>We need a progressive approach to land use in the countryside and green belt to create the absolute changes necessary so as to achieve net zero carbon within the next 12 years as the most recent IPCC report tells us. Community led and low-impact housing is a way we can meet this.</p>	
Backwell Parish Council	Backwell Parish Council	<p>In the interests of achieving a robust plan-led system within North Somerset, BPC supports Option 2 for adjustments to the settlement boundaries. Option 2 proposes the inclusion of new allocations within the settlement boundaries but removes the current policy which allows sites to come forward adjacent to the boundary. This approach</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>would provide local communities with a full understanding of the scale and location of growth planned for the local area and locations, where the principle of housing development is likely to be acceptable (i.e. within the settlement boundaries). BPC agrees with the advantages of this option, as expressed within the Issues and Options paper.</p> <p>The policy provision was previously introduced by the examining Inspector to achieve greater flexibility in housing supply. Providing the Local Plan makes adequate provision for new housing to meet the strategic housing requirement established by the adopted JSP, it will be unnecessary to retain the current flexibility in the policy to allow additional housing beyond the settlement boundaries. Should a shortfall in housing occur, sufficient to engage paragraph 11d) of the NPPF, this would provide a policy tool for developers and landowners to bring forward sustainable housing proposals.</p>	
backwellresidents	Backwell Residents Association	<p>BRA supports Option 2, to ensure a plan-led, co-ordinated approach to housing, employment and infrastructure delivery and agrees with the benefits of this option as outlined within the Issues and Options paper.</p> <p>Revisions to the settlement boundaries should serve to deliver a robust plan, capable of meeting development needs to 2036. The flexibility incorporated into the current Local Plan policies to allow development adjacent to settlement boundaries was introduced by the examining Inspector to address shortcomings within the draft plan. Such a policy provision should not be considered at the outset of plan preparation, when the focus should be upon identifying sufficient land to meet the identified development needs.</p>	
Banwell Parish Council	Banwell Parish Council	We agree that the settlement boundary does need review and support Option 2. The review needs to reflect the additional permitted developments that have taken place and site allocations included in the currently adopted Local Plan. If the reference to 'new allocations' in the options also means sites that may be allocated after consideration of the SHLAA sites and consultation during the later stages of the LP's progression, then this needs to be made clear.	
Barrow Gurney Parish Council	Barrow Gurney Parish Council	We agree with the proposal to allow some changes to the settlement boundaries to incorporate existing dwellings. The Green Belt around Long Ashton should be maintained to reduce the opportunity for speculative proposals. We support Option 2.	
BHFP		Boundaries need to be enforced to stop towns and villages merging together and Town Councils building on village Greenbelt!	
Blagdon PC	Blagdon Parish Council	Blagdon is identified as a candidate for boundary revision. The current boundary does not include the entire village which leads to some confusion. However, there are no sites allocated in existing plans and no opportunities for development. It would seem sensible for the Blagdon settlement boundary to match the parish boundary as the Parish Council still retains responsibilities for all residents within the parish area. We therefore favour Option 2 as we would be concerned about the effects of a boundary review on neighbouring villages such as Churchill and Wrington if there was any risk of encroachment.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Bleadon Parish Council		<p>We contend that the settlement boundary should remain at its current position. Small-scale development outside the settlement boundary would put pressure on existing roads and facilities without providing new facilities or services. Large-scale development outside the settlement boundary would change the character of the village irretrievably as well as putting pressure on existing roads and facilities without providing mitigation sufficiently early in the development.</p> <p>We believe that no adjustment should be made to Bleadon's settlement boundary. The village could benefit from a small number of new homes but this can be achieved within the existing boundary. The current policy should be amended to ensure that the size of any housing development adjacent to the boundary is limited in number to no more than 10% of the existing homes in the parish (currently circa 500 homes).</p>	
Burrington Parish Council	Burrington Parish Council	Option 2 is the only sensible way forward. Allowing development outside boundaries is a nonsense and was only introduced as a stop-gap measure by the Inspector on an earlier local plan. Sites should be identified and boundaries drawn to reflect development opportunities, in consultation with local residents and parish councils.	
C Chaplin		<p>Settlement boundaries need to be rigorously maintained to avoid North Somerset villages merging together.'</p> <ul style="list-style-type: none"> ▪ To prevent ad hoc, inappropriate development of greenfield sites/countryside. ▪ To preserve the character and landscape of individual villages. North Somerset Council's own Landscape Character Supplementary guidelines supports this view. ▪ People should be encouraged to walk or cycle to work. It is not possible to walk or cycle to the airport, Bristol or W-S-M. 	
Chris		Village boundaries must be maintain and not permit villages to merge and prevent ad-hoc development of greenfield sights and the countryside, to preserve the character of these villages, in fact North Somersets Landscape Character Supplementary guidelines supports this very view	
Christopher Day		I do NOT agree with proposals to alter settlement boundaries. I draw your attention to North Somerset Council's Landscape Character guidelines.	
Church Commissioners for England		<p>Settlement Boundary Review</p> <p>The Commissioners support the Council's commitment within its Issues and Options document to review the Bleadon settlement boundary as part of ongoing development of the emerging Local Plan. The document confirms that a review of the boundaries will be initiated to assess how development needs up to 2036 would be addressed through the Local Plan. The Commissioners submitted a request for pre-application advice in October 2017. The Officers response noted the Site's location outside of the Bleadon settlement boundary and the restrictions this places on its development. This was the primary focus of the Council's pre-application response due to Core Strategy 2006-2026 Policies CS14 'Distribution of New Housing' and 'CS33 Infill Villages, Smaller Settlements and Countryside' restricting development in the designated Infill Villages to that which is within the settlement boundary.</p> <p>The Commissioners strongly urge the Council to develop its Local Plan Policy in line with Option 1 'Adjust settlement boundaries to include new allocations within the boundaries and retain the current policy which allows sites to come forward adjacent to boundary'. Option 1 helps meets the government's pro-growth agenda as it allocates sites plus incorporates flexibility for other sites to come forward at a time when there is a significant under supply of housing. The Council should allow some flexibility for new development adjacent to settlement boundaries in Infill Villages where it can be demonstrated that the site is sustainable to ensure that new development can be considered appropriately on a case by case basis. This will avoid discounting sustainable development through restrictive Local Plan policies.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Cleeve Parish Council	Cleeve Parish Council	<p>Cleeve is part of the settlement boundary review and prefers option 1 as it reduces the potential for speculative development. Cleeve parish is washed over by green belt.</p> <p>We recognise that in this Plan NSC is still looking for locations for further housing development. Identified in the Landscape Assessment and Strategic Housing Land Availability Interactive map, three sites of low sensitivity have been highlighted. We would point out that Cleeve is situated under the flight path and most of the village suffers from substantial noise from the airport day and night. Secondly, Cleeve is home to the Special Area of Conservation (SAC) for the Greater and Lesser Horseshoe Bat and is also close to the Brockley SAC. Thirdly one development site in the Plan is situated on rural lanes which are used for recreational pursuit such as walking, cycling and horse riding.</p>	
Clevedon Town Council	Clevedon Town Council	<ul style="list-style-type: none"> • <i>Settlement boundaries. Which settlements will have their boundaries reviewed? (Pages 24/25/26/27)</i> <p>The Council believes that the settlement boundary could well be expanded to incorporate with Kenn village or up to the M5 barrier with Kenn.</p> <p>There is no strategic plan for looking at the next 25 years. There needs to be more thinking around where housing should be, what type i.e. social housing, 1,2,3 bed homes and numbers.</p>	
Collier		<p>Settlement boundaries need to be rigorously maintained to avoid North Somerset villages merging together.’</p> <ul style="list-style-type: none"> • To prevent ad hoc, inappropriate development of greenfield sites/countryside. • To preserve the character and landscape of individual villages. North Somerset Council’s own Landscape Character Supplementary guidelines supports this view. • People should be encouraged to walk or cycle to work. It is not possible to walk or cycle to the airport, Bristol or W-S-M. 	
Coln Residential (DLP Planning)		<p>Coln Residential support the revision of the settlement boundaries to incorporate allocations and would suggest that Option 1, which continues to allow sites to come forward adjacent to settlement boundaries, should be retained.</p> <p>This current policy supports a degree of flexibility in housing delivery and allows for the Council to maintain a 5 year land supply. Unless the Council intend to provide a larger quantum of site allocations than the past to enable the market to deliver as envisaged, it is considered prudent to retain this flexibility.</p> <p>The emerging JSP strategy for North Somerset has a high reliance on several large-scale SDLs, which in many instances require significant infrastructure investment or have multiple land owners. These issues have the ability to undermine delivery and therefore it is important that the NLP has the flexibility to respond to these potential issues.</p>	
Coln Residential (DLP Planning)		<p>Coln Residential are supportive of revising settlement boundaries to reflect allocations and Option 1 which retains the potential for development proposals adjacent to settlement boundaries to come forward. This additional degree of policy flexibility is required to reflect the emerging JSP strategy which places a high reliance on large scale SDLs with associated infrastructure and land ownership delivery risks.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Congresbury Parish Council	Congresbury Parish Council	We would favour option 2 as it is unfair that an adjusted settlement boundary would then be liable for further growth. Without this change in policy there would be unsustainable and unplanned growth plus it would mean the settlement boundary definition would hold no weight. This is very important to villages of all sizes.	
Corylus P&E Ltd	Corylus Planning and Environmental Ltd	<p>The Joint Spatial Plan for North Somerset identifies a need for 102,200 homes up to 2036, of which 25,000 are to be delivered within North Somerset over the period 2026-2036.</p> <p>The Local Plan 2036 Issues and Options document identifies that 13,932 homes have already been delivered, or are committed, and the remainder of the requirement are to be delivered through brownfield sites in urban areas (“urban living” sites), strategic development sites and smaller sites (“non-strategic growth” sites). Sites that are not allocated, i.e. “windfall” sites are required to deliver 1,300 homes over the 10-year period.</p> <p>Option 2 would prevent the Council from favourably considering planning applications for housing on windfall sites adjacent to development boundaries. Only those windfall sites within settlements would receive support. This could be problematic for the Council as in urban areas, brownfield sites suitable for housing developments are more likely to be identified through the site allocation process as “urban living” sites. Any windfall sites within urban areas are therefore likely to be small. Similarly, within the smaller settlements of the district, windfall sites that would come forward would be very modest in scale.</p> <p>If the Council pursues Option 2, we question whether the annual windfall target would be met, this in turn would impact upon the Council’s delivery of its annual housing requirement and would have implications for the Council’s Five Year Housing Land supply.</p>	
CPRE Avonside	CPRE Avonside, North Somerset District	The current policy of allowing development adjacent to settlement boundaries is flawed. It offers uncertainty for local communities and should be discontinued. Clearly, it does not provide a plan led approach.	
Cresten		Option 2, but there should be community consultation before site allocation.	
D Yeates	Savills	<p>Firstly, we strongly agree that the Council should be reviewing existing settlement boundaries to assess whether revisions should be made to accommodate changes since the adoption of the Core Strategy and Site Allocations Plan. We also welcome reference to the list of settlements to be assessed through a settlement boundary review, including service villages such as Backwell and infill villages such as Flax Bourton.</p> <p>In our view, Backwell and Flax Bourton would benefit from a settlement boundary review given that they are capable of accommodating growth commensurate with the size and scale of each settlement. Such a review should be undertaken alongside a Green Belt review to ensure that opportunities are not missed and there is a consistent approach to planned future development.</p> <p>Of the two options presented, we support Option 1</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
D.Hayler		<p>The decision to review the settlement boundaries has clearly been taken. The purpose of the inclusion of this section appears to be to allow more houses to be built whether there is a designation of infill village or not from the previous section.</p> <p>It is clear that it becomes a much simpler matter to designate a village as 'infill only' if the 'Settlement Boundary' review allows a much bigger area to be designated as the 'settlement'.</p> <p>If the options are limited only to the two provided, Option 2 appears to be the least worst option. The concept within Option 1 of a 'settlement boundary' that can be built adjacent too means it is not a real boundary.</p>	
Desiree Tomlinson		<p>Settlement boundaries need to be rigorously maintained</p> <ul style="list-style-type: none"> • To avoid North Somerset villages merging together. • To prevent ad hoc, inappropriate development of greenfield sites/countryside. • To preserve the character and landscape of individual villages. NSC''s own Landscape Character Supplementary guidelines supports this view. 	
Donna Rawlins		<p>We fully support CALRAG's statement that Settlement boundaries need to be rigorously maintained to avoid North Somerset villages merging together.</p> <p>To prevent ad hoc, inappropriate development of greenfield sites/countryside.</p> <p>To preserve the character and landscape of individual villages. North Somerset Council's own Landscape Character Supplementary guidelines supports this view.</p> <p>People should be encouraged to walk or cycle to work. It is not possible to walk or cycle to the airport, Bristol or W-S-M.</p>	
Dovecote		<p>Settlement boundaries should not be adjusted where to do would result in loss of greenbelt.</p> <p>Settlement boundaries should respect neighbouring parishes.</p> <p>Adjusting the settlement boundary to the north of Nailsea would both result in a loss of greenbelt and detrimentally impact the parish of Wraxall.</p>	
Dr Moya Wilson		<p>It is imperative to maintain settlement boundaries, and distinct villages, avoiding housing development on green fields in the countryside. The villages near this proposed 'Garden Village' are already suffering from these. Please register my objection to the proposed Mendip Spring Garden Village.</p>	
E Folkes		<p>9. We are in danger of urban sprawl, creeping urbanisation with the proposals, especially in view of the number of houses already being located in Churchill and Langford. Settlement boundaries need to be reinforced and protected to keep our villages' own individual identities.</p> <p>In all honesty the government's current policy of housebuilding has caused many problems.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>I understand that there are some 1.4 million potential plots on brownfield sites according to the CPRE. There are many empty houses which owners should be forced to let or sell. Just recently in the news were the thousands of MOD houses lying empty, some for 10 years, which tax payers are funding. They will also need completing renovating, paid for by the tax payer, as they have been vandalised and stripped. Surely these would be better placed to be used for housing.</p> <p>I am even aware of council tenants that are not occupying the houses that have been let to them, for one reason or another, which could go to those in need of them.</p> <p>The policy of excessive housebuilding is not the solution to the housing problem. Making houses affordable is. I do not believe that houses are selling as well as they could and just looking at Rightmove and other estate agents shows that houses, including the new builds, are being reduced in price. Potentially we are going to see people in negative equity again before long.</p>	
E Johnson		<ul style="list-style-type: none"> • Settlement boundaries need to be rigorously maintained to avoid North Somerset villages merging together.’ • To prevent ad hoc, inappropriate development of greenfield sites/countryside. • To preserve the character and landscape of individual villages.North Somerset Council’s own Landscape Character Supplementary guidelines supports this view. • People should be encouraged to walk or cycle to work. It is not possible to walk or cycle to the airport, Bristol or W-S-M 	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	<p>There are anomalies for Easton/Pill in that significant development at Ham Green is currently outside the settlement boundary but within the Green Belt. We think this anomaly should be removed and the boundary adjusted. A boundary should be established for Abbots Leigh – drawn so as to recognise the historic Village Fence.</p> <p>Our view is that adjusting boundaries to include new allocations within existing boundaries is likely to limit the degree to which sites can come forward to meet local need (e.g. affordable housing to meet local need or smaller housing for older residents). Keeping boundaries tightly defined prevents speculative development and allows the Neighbourhood Plan and the subsequent planning process to influence the size, tenure and design of exceptional new housing in the Green Belt. We believe that in all four sub-areas of our NPA (Easton, Pill, Ham Green and Abbots Leigh) there are a few small sites both within existing boundaries and adjacent to existing (if adjusted) boundaries. There may thus be scope for infill development within settlements but also for modest new development in the Green Belt on appropriate adjacent sites. We strongly oppose the adjustment of boundaries which would permit major new Green belt development.</p> <p>Our choice of options as far as our area is concerned therefore are:</p> <ul style="list-style-type: none"> • Adjust settlement boundaries to reflect recent development (Easton/Pill) and the need for a formal boundary (Abbots Leigh), • Retain these boundaries without providing new allocations within the settlements • Allow sites to come forward adjacent to the boundaries 	
Ed Northcott	Mr	As for Q8, It seems that you are unfortunately revising the settlement boundaries in order that you can build more houses, rather than for the benefit of the settlement community per-se.	
EWH	Edward Ware Homes	<p>Where will the non-strategic sites be and settlement boundaries?</p> <p>4.5 The Council are not currently making reference to specific sites at this point but do suggest that those shown on the Council’s latest Strategic Housing Land Availability Assessment (2018) give a strong indication of preference.</p> <p>4.6 At present our clients land (HE18122) is discounted. However, we understand that it was discounted during the Part 1 assessment which discounted sites if they were:</p>	<p> Land Improvements.pdf (784 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • Designated SSSI; • Entirely within the Green Belt; • Covered by Local Green Space; • Entirely within the AONB; • Entirely within Flood Zone 3b; and • Sites with no boundary adjoining an existing settlement boundary <p>4.7 In the case of our clients land it is not the subject of any of the formal designations/constraints. It does however fall beyond the settlement boundary. However, it is our view that the settlement boundary is out of date and does not currently reflect the latest position within the settlement given that permission has been granted for residential development:</p> <ul style="list-style-type: none"> • Land off Bristol Road Churchill – Outline permission (17/P/1200/O) for up to 41 dwellings granted 18th July 2018 and reserved matters (18/P/4241/RM) submitted in September 2018 for 40 dwellings. • Land to the West of Says Lane, Langford – Outline Permission (15/P/1313/O) for up to 43 dwellings granted 23rd November 2016 and reserved matters for 43 dwellings (17/P/2560/RM) granted on 20th June 2018. <p>4.8 Both sites adjoin existing residential development to the south of the Bristol Road and both are identified allocations within the existing Site Allocations Plan. Accordingly, we suggest that the settlement boundary will be amended to accommodate these sites. As such, our clients land should have been taken forward to a Part 2 Assessment and we consider it would have scored favourably.</p> <p>4.9 The Council also is consulting upon two options regarding the review of settlement boundaries and the current flexible approach to development adjoining the settlement boundary.</p> <p>4.10 Accordingly, our preference is Option 1 that existing boundaries should be adjusted to account for any existing or proposed allocations and the flexible approach to sites beyond boundaries being retained. It is worth revisiting why this policy was introduced. It was introduced because the Council had struggled to deliver sufficient sites within existing boundaries and a general weakness in the Council’s supply trajectory. Given our comments above we consider this is likely to remain to be an issue going forward.</p>	
First Step Homes	First Step Homes (Wessex) Ltd	<p>The approach of Option 1 is supported as this allows for additional flexibility within the Plan period for non-strategic Windfall sites. Still carefully considered against other Development Management criterion as well as National guidance; development adjacent to Service Village boundaries is sustainable and similarly to the response above, provides the additional patronage for facilities and services within these important settlements.</p>	
Flax Bourton Parish Council	Flax Bourton PC	<ul style="list-style-type: none"> • Option 2 provides for a ‘clear cut’ policy for a village of where development will or will not be considered – and under Q5, we have suggested some very minor adjustment to the settlement boundary of Flax Bourton village could be considered. Option 1 can lead to speculative applications by developers on what is or is not adjacent to a Settlement Boundary. • In the case of Flax Bourton, the village is completely “washed over” by the Green Belt so any extension would fall outside current NPPF guidelines. Also, the village scores low on sustainability with no local services apart from a Primary School. • Within the Landscape Character Assessment (March 2018) Flax Bourton is bounded on three sides by “Rolling Valley Farmland” and on the remaining side by “Cleeve Ridges and Combs”; the strategy for both is to conserve and strengthen. Also, on the north side by Registered Park and Garden land (Tyntesfield and Bathing Pond Wood). 	
Gladman Developments Ltd	Gladman Developments	<p>4.3.16 Gladman are supportive of Option 1 which will allow for settlement boundaries to be amended to include site allocations and to retain the current policy which allows sites to come forward adjacent to settlement boundaries. This policy has been highly advantageous for North Somerset in the previous 12-18 months and has allowed the</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Council to permit sustainable development in accessible locations across the authority area to try and maintain a five-year housing land supply. This was most notable during the intervening period of the Site Allocations Plan Examination in Public where the Inspector requested that the Council find additional sites to meet their identified shortfall.</p> <p>4.3.17 The Council currently acknowledge that they can't currently demonstrate a five-year housing land supply. Therefore, additional growth from small and medium sized sites adjacent to villages / town boundaries is inevitable until the identified shortfall is rectified and will be a more efficient way of dealing with under-supply than relying on large-scale strategic development location sites.</p> <p>4.3.18 A number of villages within the authority area are now in the process of preparing Neighbourhood Plans or have made Neighbourhood Plans. This will allow for local communities to manage where future development is located within their village / towns over the course of the plan period. However, it must be remembered that as part of the Plan preparation process, the Local Planning Authority will need to set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development to conform with Paragraph 65 of NPPF2 and to promote sustainable development in rural areas to maintain and enhance their vitality and viability.</p> <p>4.3.19 Option 2 would be a restrictive policy which would frustrate the flexibility available to the Council of bringing forward new sites (even if they comprised sustainable development) outside of settlement boundaries.</p> <p>4.3.20 The policy approach should continue to be flexible to be able to provide opportunities for sustainable housing development in locations which are well related to the existing development boundaries, to allow the Council to quickly address any issues in shortfall in housing supply against the plan requirement.</p>	
Graham L		<p>Regarding settlement boundaries, I believe these to be important to prevent inappropriate development of greenfield sites, helping to prevent the rash of speculative planning applications by Land Agents who have no consideration for local issues – only their own profits.</p>	
GVA Grimley	GVA Grimley	<p>We would support option 1 given the potential increase for flexibility to deliver sustainable sites which fall adjacent to existing development areas – the extension to the former Moss land at Locking (SHLAA HE1832) is an example of this.</p> <p>We note there are anomalies which also need to be considered, Land West of Kenn Road, Clevedon being one where the significant allocation (and adjoining business park) are outside of the settlement boundary and not physically attached to but merit inclusion within the Clevedon boundary.</p>	
H Parry		<p>Settlement boundaries need to be rigorously maintained</p> <ul style="list-style-type: none"> To avoid North Somerset villages merging together; To prevent ad hoc, inappropriate development of Greenfield sites To preserve character/landscape of individual villages.NSC's own Landscape Character Supplementary guidelines supports this view. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
Hallam Land Management Ltd (David Lock Assoc)		HLM consider that Option 2 (amend boundaries to include new allocations and remove the policy to allow sites adjacent to the boundary to come forward) is the most appropriate in terms of positive planning, as it minimises the opportunity for windfall sites to come forward in likely-unsustainable locations. Whilst an element of windfall can be relied upon in housing land supply, growth should inherently be plan-led. Moreover, any encouragement of piecemeal development beyond the settlement boundary runs contrary to the objectives of the proposed 'Urban Living' initiative.	
Hayes Family and Mr Cope		5.17 It is our view that Option 1 should be pursued; we do not agree that the current policy which allows sites to come forward adjacent to the settlement boundary for up to 75 dwellings should be removed. This is because the policy currently provides flexibility to allow for development to come forward in sustainable locations. North Somerset Council have consistently been unable to demonstrate a five year housing land supply and concerns were raised by the Inspector over the delivery of sites allocated within the Site Allocations Plan and indicated that certain sites may not be delivered at all within the plan period. The policy provides a reasonable alternative and flexibility to meet these requirements and should be retained for the foreseeable future. In addition to this, a review of existing allocations is required to ensure they remain deliverable and further sites need to be allocated to meet the minimum requirements.	
Hoddell Associates (Quinton)	Hoddell Associates	Both the options espoused seem again to be unwilling to accept the flexibility which option 3 under Question 8 above might provide. Certainly, there is no option under this heading for stating the removal of settlement boundaries.	
Home Builders Federation Ltd (S Green)	Home Builders Federation Ltd	The HBF preference is Option 1 which is the most flexible policy approach. For the Council to maximize housing supply the widest possible range of sites by size and market location are required so that small local, medium regional and large national house building companies have access to suitable land in order to offer the widest possible range of products. As advocated in the Housing White Paper (HWP) " <i>Fixing the Broken Housing Market</i> " a mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.	
J Gower-Crane		<p><u>3.2 Settlement boundaries What are settlement boundaries?</u></p> <p>Keep Bleadon's settlement boundary and create a natural green gap/green filed space between villages and sprawling urbanized towns.</p> <p><u>Why do the existing boundaries need to be reviewed?</u></p> <p>Developments adjacent to settlements like Bleadon do not mean that Bleadon should lose its infill status and allow expansion to 'join' up with the urban sprawl from WSM</p> <p>This plan seems to be all about growth but it is not necessarily in step with local Bleadon need and may be in conflict with its Neighbourhood Development Plan project. e.g. The SHLAA sites adjacent to the current settlement boundary (from likely to unlikely) indicates much more housing would be acceptable to NSC than currently expressed from the NDP feedback. Bleadon like other villages has an increasing elderly population that may not require family homes, instead potentially needing, bungalows, assisted home living, etc. How will the local plan ensure the correct type of local housing is built, not just what Central Government, JSP or the developer want to build?</p> <p><u>What are the options for reviewing the settlement boundaries?</u></p> <p>Options seem to seem to meet government's pro-growth agenda and JSP's target not necessarily Bleadon's local need.</p> <p>When considering Bleadon's settlement boundary it should be remembered that part of it is in a flood zone, it currently has a fantastic landscape on the edge of the Mendip Hills that should be protected, and several protected areas that should remain e.g.ANOB, SSSI, SNCI, wildlife reserves, and a bird sanctuary on levels which should all be protected from direct and indirect development. It also is a settlement heritage that goes back to the Bronze age, i.e. Bleadon Man.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p><u>What is proposed for North Somerset?</u></p> <p><i>Infrastructure delivery plan</i> – The Infrastructure that includes hospitals, doctors, etc. should be in place before this large scale increase in development and associated residents.</p> <p>NSC has stated that it has worked with JSP, town and parish Councils, developers and landowners, when will residents being actively consulted?</p>	
J Maycock		<ul style="list-style-type: none"> • Option one is the only solution that would be acceptable. It is critical that in the context of JSP proposals that settlement boundaries are rigorously maintained to avoid North Somerset villages merging together. To loosen existing boundaries would effectively result in a deluge of unsuitable and ad hoc developments that would create an urban sprawl in the countryside. • The existing character and landscape of service villages must be preserved Development within settlement boundaries 	
J Milward		<p>I support Option 1. This option would indeed ensure plan-led distribution of housing and reduces the potential for both speculative development and large scale proposals like the 700 home JSP proposal for the west of Backwell. It fits with the governments pro-growth agenda and would allow sustainable infill proposals to come forward that would have minimal effect on existing local communities and the integrity of the wider Green Belt.</p> <p>I note that the West of England Joint Spatial Plan (November 2017) seeks in Policy 5 - Place Shaping Principles to -</p> <p>"Create character, distinctiveness and sense of place which diversifies the residential offer, improves accessibility, affordability and enhances identity".</p> <p>I also note that the North Somerset Council Core Strategy (Jan 2017) in Primary Objectives wants to –</p> <p>"Deliver sustainable housing development across North Somerset to meet housing needs".</p> <p>I consider that Option 1 is more likely to achieve these JSP & Core Strategy aims.</p>	
Jan Murray	CALRAG	<p>8. Boundaries: Pages 24-27</p> <p>8.1. Settlement boundaries should be retained. Currently planning applications are being granted that are adjacent to settlement boundaries. When does 'adjacent' become 'sprawl' as the next application which is near to the one that is adjacent to the village boundary becomes adjacent to the new boundary created by the new development!</p>	
K Hanson		<ul style="list-style-type: none"> ◦ Settlement boundaries need to be rigorously maintained to avoid North Somerset villages merging together.' <ul style="list-style-type: none"> ▪ To prevent ad hoc, inappropriate development of greenfield sites/countryside. ▪ To preserve the character and landscape of individual villages. North Somerset Council's own Landscape Character Supplementary guidelines supports this view. ▪ People should be encouraged to walk or cycle to work. It is not possible to walk or cycle to the airport, Bristol or W-S-M. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
Kenn Parish Council	Kenn Parish Council	Option 1	
Kit Stokes	StokesMorgan Planning Ltd	<p>Support Revised Settlement Boundaries but recommend a mixture of Options 1 and 2.</p> <p>Some settlement boundaries are out of date. If a policy is to allow development adjoining a settlement boundary then it needs to reasonably reflect what is on the ground, not what existed in 2007.</p> <p>For example at Langford the allocated retail centre is located outside the settlement boundary. A sensible approach needs to identify that newly allocated or approved housing developments do not become the new HDB.</p> <p>Policy should be adapted to allow growth adjoining the Settlement Boundary of Service Villages in the Green Belt to allow small scale growth.</p> <p>Infill villages should have a Settlement Boundary so that small scale infill development can take place (even if the site is in the Green Belt) so that each village can absorb an appropriate amount of development so that local facilities can be supported.</p> <p>For example there are suitable small scale infill sites in the villages of Portbury, Tickenham, Abbots Leigh which can be accommodated to the benefit of the village (support schools, play groups, Parish Councils etc).</p>	
Lands Improvement		<p>SETTLEMENT BOUNDARY REVIEW</p> <p>6.1 The Issues and Options document proposes two options for the consideration of potential amendments to the settlement boundaries policies.</p> <ul style="list-style-type: none"> • Option 1 – Adjust settlement boundaries to include new allocations within the boundaries and retain the current policy which allows sites to come forward adjacent to boundary. • Option 2 – Adjust settlement boundaries to include new allocations within the boundaries but remove the current policy which allows sites to come forward adjacent to the boundary. <p>6.2 We would favour Option 1; however, in relation to settlements such as Easton-in-Gordano sites beyond the settlement boundary are only likely to be brought forward via specific allocations given the Green Belt constraint.</p> <p>6.3 We would also stress that the approach to settlement boundaries cannot be considered in isolation from other aspects of Local Plan policy. This needs to consider existing constraints based on up to date evidence as well as a detailed understanding of both the overall requirement (as evidenced by the JSP) but also the aspiration of local communities to meet their specific needs.</p> <p>6.4 As is evident from the consultation document there is a mixture of approaches to settlements within North Somerset which are constrained by the Green Belt. Some are washed over whilst others are inset from it. Whilst a consistent approach may be favoured moving forwards, it must be underpinned by a robust evidence base in order to inform choices regarding both site allocation and the identification of suitable and defensible boundaries associated with any Green Belt release.</p>	
Lesley Hegarty		Recent amendments to local policy (CS32) have significantly eroded the efficacy and purpose of settlement boundaries of Service Villages. If rural communities are to be maintained as part of the make up of North Somerset then a rigorous settlement boundary policy should be re-instituted and adhered to.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Libbyrich		This should be redrawn to incorporate all existing developed land. Also serious consideration should be given to small scale releases of land not within the flood plain or directly abutting Weston Big Wood.	
Local Access Forum	Local Access Forum	In general, the LAF feels it would be better if new building is next to or close to available A roads which are capable of funnelling traffic safely away to wherever people are working. Several of the smaller towns have little in the way of employment and it is unrealistic to think that people will rely on a fragmented and expensive public transport system. They will use their cars.	
Long Ashton Parish Council	Long Ashton Parish Council	Any revision to settlement boundaries needs to be undertaken in conjunction with the affected parishes, taking account of local issues and requirements. Option 2, would then remove uncertainty from the planning process and avoid unwanted speculative applications.	
M Abbott		<p>Settlement Boundaries</p> <p>These need to be rigorously maintained:</p> <ol style="list-style-type: none"> 1. to avoid north Somerset villages merging together. 2. To prevent inappropriate development of green field sites/countryside 3. to preserve the character and landscape of individual villages. NSC's own Landscape Character Supplementary guidelines support this view. 	
M Avery		Villages in North Somerset have an independent character. Settlement boundaries need to be preserved in order to prevent villages merging together. North Somerset Councils own Landscape Character Supplementary guidelines supports this view.	
M Hayman		Support option 2.	
Margaret Munro		Strictly enforce existing settlement boundaries to preserve character and landscape of North Somerset Villages	
Margo		Reviewing settlement boundaries - option 2. Tickenham should not be labelled as a country side settlement. It is more of a service village as it is a commuter village to Bristol and between Nailsea and Clevedon.	
Mary Cradock		Option 1 is also preferable in my opinion. Settlement boundaries are an established planning tool but should not be used to dissuade sensible and sustainable developments adjacent to settlement boundaries from coming forward over the plan period. Removing the current policy provision which allows for sites to come forward adjacent to settlement boundaries (i.e. Option 2) would reduce the overall flexibility of the policy to be utilised over the plan period. Any sites proposed outside but adjacent to settlement boundaries would need to be justified on their own merits, which should provide a sufficient test to preclude unsustainable developments from coming forward.	Mary Cradick site plan Response 18.12.07.pdf (500 KB)

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Site Merits</p> <p>My client's site is located in a sustainable location, adjacent to the village of Locking and hence capable of coming forward for development under the current policy provisions. The site is situated in an accessible location with many day to day services available within reasonable walking and cycling distance in Locking.</p> <p>The site is covered by the Strategic Gap (Policy CS19) but it is our contention that its development would be acceptable in principle on the basis that the development of the site would not harm the open and undeveloped character of the locality, would not harm the separate identity and landscape setting of Locking and would not demonstrate an uncharacteristic scale and pattern of development in this location. Furthermore, its development would not fail to respect the character and surroundings of the site and certainly would not result in any harm to the character and appearance of the countryside given its location surrounded by built form.</p> <p>My client's site as well as another in the locality have recently been tested at appeal. See refs:</p> <p>APP/D0121/W/18/3206517 and APP/D0121/W/18/3199616 respectively.</p> <p>The latter appeal relates to a site in a similar position to my client's – between the existing Locking village settlement boundary and the A371 and within the same extent of the Strategic Gap. The appeal proposal for the construction of 8 no. bungalows was allowed whereas the appeal on my client's site for 5 no. dwellings was refused. In the respective appeals, a completely contrary approach to the importance of the Strategic Gap was taken – i.e. it was given substantially more weight in my client's appeal decision, which actually post-dates the decision on the neighbouring site. An enquiry with PINS on the consistency of its decision making is currently pending.</p> <p>As a result of the allowed appeal, the Strategic Gap between Locking and the A371 will be further eroded. This new development, coupled with existing developments within the Strategic Gap area 3</p> <p>(namely the industrial estate to the east and housing/service station to the west of my client's site), substantially reduce the case for the retention of the Strategic Gap in this location.</p> <p>Accordingly, the extent of the Strategic Gap as defined by Policy CS19 and the accompanying Proposals Map should also be reviewed as part of the Issues and Options review of the Local Plan.</p>	
Mead Realisations Ltd		<p>Question 9 of the Issues and Options document seeks views on the options for revised settlement boundaries and asks whether the current policy which allows sites to come forward adjacent to settlement boundaries should be retained. In this respect Option 1 is supported although, through monitoring, the Council must ensure that decisions are not unnecessarily delayed through the development management process.</p> <p>2.30. Page 29 of the Issues and Options document suggests that the Generating Ideas consultation undertaken in November 2017 has informed the further planning of the SDL's although it is not clear what issues were raised or how the Council has addressed them.</p> <p>2.31. Reference is also made to a new infrastructure delivery plan although it is not clear what progress made in relation to the existing IDP and where issues have been experienced.</p>	
Mendip Hills AONB unit	Mendip Hills AONB Partnership	<p>In terms of proposals for settlement boundary reviews, we would highlight that such a review take into consideration the Mendip Hills AONB boundaries particularly as relates to settlements of Banwell, Churchill, Winscombe, Bleadon, Hutton, Sandford, and Blagdon.</p> <p>The NPPF under paragraph 172 sets out that 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues ... The scale and extent of development within these designated areas</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest ...'.</p> <p>The DEFRA 25 Year Environment Plan further sets out under paragraph 2.2.1 that 'Some of England's most beautiful landscapes and geodiversity are protected via a range of designations including National Parks and Area of Outstanding Natural Beauty (AONBs)... Over the next 25 years we want to make sure they are not only conserved but enhanced'. Paragraph 2.2.2 further sets out that 'In England, a quarter of our landscape is designated in this way, around 10% as National Parks and 15% as AONBs. We will make sure they continue to be conserved and enhanced, while recognising that they are living landscapes that support rural communities... While development is not prohibited in National Parks or AONBs, major development should take place only in exceptional circumstances'</p>	
Michael Norman		To prevent deleterious consequences of villages merging, it is essential that settlement boundaries are maintained.	
Moor Park (North Somerset) Ltd (MP)		<p>The SAP Examination Inspector made it clear that settlement boundaries should be adjusted to include new allocations⁹. The need to maintain the current policy which allows sites to come forward adjacent to the adjusted boundaries will depend on the flexibility within the site allocations themselves, and in particular for the release of early phases of development.</p> <p>The essential reason why the Core Strategy Examination Inspector found it necessary to introduce such policy flexibility was due to the considerable reliance on large strategic sites to deliver the overall housing requirement, and the evidence that strategic sites (in particular the Weston Villages) and other allocations were failing to deliver housing at the necessary rate. On the face of it there is little change through the emerging Local Plan given the heavy reliance on large strategic sites, with very substantial infrastructure requirements, and with back-loaded delivery trajectories that indicates little contribution to housing supply until the second half of the plan period.</p> <p>It would therefore appear that the emerging Local Plan contains heightened risks of delivery failures from allocated sites, and therefore the flexibility to bring forward additional sites remains essential. However, as alluded to by Inspector Burden, such intended flexibility is currently negated by drawing SG boundaries tightly around the main settlements. This contributes further to the need to discontinue SG designations if the previous difficulties of persistent under-delivery of housing due to over-reliance on large strategic sites, are to be alleviated. The need for such flexibility is compounded by the back-loaded delivery trajectory of the emerging strategic allocations, and the continuing inability of the Council to demonstrates a five year supply of</p> <p>deliverable housing land notwithstanding the recency of the adoption of the Site Allocations Plan. The identification of non-strategic sites in sustainable locations that can make an early contribution to housing land supply, is therefore imperative.</p>	
Mr C Booy	-	<p>Q.9 Revised Settlement Boundaries</p> <p>The village of Portbury is identified as 'Countryside' within the current hierarchy and is listed within the consultation document as a settlement to be addressed via boundary review. Two options have been presented of which Option 1 is most preferable given the aforementioned need for flexibility. Option 1 allows for a settlement boundary review to include new allocations, whilst maintaining current policy that allows further sites to come forward adjacent to the boundary. It is not deemed that this will result in an influx and subsequent approval of inadequate sites, but it allows for consideration which is necessary given changes that occur over time.</p> <p>With regard to Option 2, even though it is preferable to the current situation, it removes the current policy that allows sites to come forward adjacent to the settlement boundary. As a result of this, consideration of sites stops after allocated sites have been determined and as a result there would be no allowance for further consideration of potentially acceptable sites over the plan period.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		As explained, Portbury currently has no settlement boundary given its blanket Green Belt designation. We suggest that due consideration should be given to providing a settlement boundary for Portbury to allow much needed small scale residential development. This approach neatly falls in line with Option 3 of the above settlement hierarchy review which removes settlement categories.	
N Cooper	Claverham Future	Option 2 is the only honest option, mistakes and forced developments are patently existing so move the boundary but be explicit that is the boundary and remove the ridiculously weak 'adjacency' allowance.	
N Green		Settlement boundaries need to be rigorously maintained <ul style="list-style-type: none"> To avoid North Somerset villages merging together. To prevent ad hoc, inappropriate development of greenfield sites/countryside. To preserve the character and landscape of individual villages. NSC's own Landscape Character Supplementary guidelines supports this view. 	
Nailsea		The disadvantages of Option 2 seem to be missing from this document (before Question 9) Residents have the right to know the limit of building in their communities	
Nailsea Town Council	Nailsea Town Council	A relaxation of the settlement boundary around Nailsea is necessary to facilitate more appropriate development locations. This also requires the local review of the Green Belt boundary (see response to Q5) and the settlement boundary, as both are contiguous to the north of Nailsea. pp30-32, Plan A – routes W3 and W4 are supported but a connection from Bristol Road east of Wraxall around the northern side of the town to connect into W4 is also required. This would improve access to employment sites to the north of the town. NTC opposes plans to generate more traffic onto the A370 and favours the greater use and improvement of the B3128. Therefore, route E3 is not supported.	
Natalie Ward		Your own Landscape Character Supplementary guidelines support the view that settlement boundaries should be rigorously maintained to prevent villages merging together – this is essential for villages to retain their identity, character and individuality. The should be adhered to in order to prevent ad hoc inappropriate development on greenfield sites.	
Newcombe Estates Company Limited	Boyer planning	Settlement Boundaries (Question 9) 3.18 Settlement boundaries are an established policy tool that is linked to the wider settlement hierarchy. As set out in our response to Question 8, a Growth based strategy to inform a future settlement hierarchy is supported for the reasons set out above. Such an approach has implications for the approach to Settlement Boundaries in terms of their application, specifically, the need to recognise that Settlement Boundaries should not represent an artificial constraint to the delivery of sustainable development. 3.19 The location of a site outside, but adjacent to a settlement, does not render a site unsustainable and this should be clearly articulated through the North Somerset Local Plan.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>3.20 Settlements which currently do not have a Settlement Boundary should not automatically be excluded from re-assessment in terms of their position within the settlement hierarchy. The current classification of settlements as ‘countryside’ is not considered appropriate as it implies that such settlements are devoid of services and facilities or that such settlements cannot contribute to the delivery of sustainable development.</p> <p>3.21 In general terms, the approach to the consideration of sites/locations, within the designated Green Belt is not supported. Furthermore, it is considered that the apparent blanket restriction of development within the Green Belt will artificially constraint development and critically, prevent the sustainable growth of settlements. Therefore, the ability of lower tier settlements to move up the settlement hierarchy, will be prevented due to the failure of the Council to consider appropriate development opportunities on sites within the Green Belt. The approach to the Green Belt effectively facilitates the stagnation of those settlements entirely within the Green Belt, by excluding genuine sustainable development opportunities from detailed assessment.</p> <p>3.22 Such an approach is considered to be inconsistent with the National Planning Policy Framework and with a particular focus on rural areas the Framework (para 78) is clear that:</p> <p>“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to growth and thrive, especially where this will support local services.”</p> <p>3.23 The approach to the settlement hierarchy and settlement boundaries should be set within the context of providing a positive policy framework that facilitates sustainable patterns of development. A strategy informed by a settlement hierarchy and settlement boundaries can provide certainty that the minimum strategic requirements can be achieved over the Plan period. However, their application should not prevent wider opportunities for development from coming forward. The strategic housing requirement does not and should not, represent a moratorium on development in excess of this requirement.</p>	
Newland Homes		<p>3.16 We welcome the proposals to review the Settlement Boundaries to allow for additional housing needs to be met within the Towns, Service Villages and Infill Villages, including Claverham.</p> <p>3.17 The Issues and Options document proposes two options for the consideration of potential amendments to the settlement boundaries policies.</p> <ul style="list-style-type: none"> • Option 1 – Adjust settlement boundaries to include new allocations within the boundaries and retain the current policy which allows sites to come forward adjacent to boundary. • Option 2 – Adjust settlement boundaries to include new allocations within the boundaries but remove the current policy which allows sites to come forward adjacent to the boundary. <p>3.18 On balance, we would favour Option 1.</p> <p>3.19 The Claverham Neighbourhood Plan (CNP) was adopted in February 2018, following a successful referendum with 97% of votes in favour of the plan. Although the CNP ‘carries over’ the settlement boundary for Claverham established by the (existing) Local Plan, it allocates the central part of the site for residential or mixed residential and employment development under Policy D3 (site PS1). This is a clear acknowledgement of the ability of appropriate sites outside the village boundary to accommodate development and meet housing need, where other opportunities within the boundary are highly likely to be limited to small scale development. 100% of those attending the public meeting on March 18th, 2016 voted in favour of the policy.</p> <p>3.20 The CNP recognises that development opportunities within the current settlement boundary are limited due to physical and/or environmental constraints and has allocated site PS (1) as an equally appropriate alternative despite the settlement boundary. In this way, it has not been artificially constrained by pre-existing policy constraints</p>	<p>Newland Homes UTAs Claverham.pdf (2.0 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>but rather takes advantage of a site which represents an appropriate development location, outside of the Green Belt, well screened and free of insurmountable technical or environmental constraints. The Local Plan, too, needs to be prepared in this way to plan for housing.</p> <p>3.21 Policy CS32 'Service Villages' allows for developments of up to around 25 units to come forward adjacent to settlement boundaries, provided they are respectful of the character and scale of the village and not within the Green Belt. For the reasons outlined above, we support the retention of this provision. We also suggest that it should be applied, as a principle, to Infill Villages in a manner which is proportionate to the existing village population.</p>	
Newland Homes		<p>4.1.22 Q9 of the Issues and Options document seeks views on the options for revised settlement boundaries and asks whether the current policy which allows sites to come forward adjacent to settlement boundaries should be retained. However, it would be useful to understand how many dwellings have been delivered so far as a result of this policy such as although the Council has not provided any background to explain how effective these policies have been since they were adopted.</p> <p>4.1.23 It is considered that any flexibility is an important aspect in maintaining a supply of housing. Option 1 is therefore supported although through monitoring the Council must ensure that decisions are not unnecessarily delayed through the development management process.</p>	
Nigel Bennett (Magenta)	Magenta Planning	<p>Regarding the options for adjusting settlement boundaries, option 1 to adjust boundaries to include new allocations and retain current policy which allows sites to come forward adjacent to a boundary is favoured, as the more pragmatic and flexible solution of the two.</p> <p>As referred to earlier however, the review should also take the opportunity of considering the extent and appropriateness of the washed over settlements (infill villages) within the Green Belt. This should include an assessment of the contribution of these settlements to Green Belt openness, noting the Government's advice at paragraph 140 of the NPPF, which states:-</p> <p>'If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation areas or normal development management policies, and the village should be excluded from the Green Belt'.</p> <p>In respect of Cleeve, we would be interested in reviewing your assessment at the appropriate time, as we are not convinced that its inclusion within the Green Belt is justified on grounds of its 'open character'. As such, there may be scope to simply inset the village but with its boundaries extended as promoted to include the site at No3 Main Road.</p>	<p>Magenta Planning Ltd - Cleeve Site.pdf (209 KB)</p> <p>Pre-App Document Magenta Planning Ltd.pdf (2.1 MB)</p>
Nomad		<p>The Abbots Leigh settlement could benefit from the review process set out on page 26, Local Plan 2036. The two options in the plan are an opportunity to have a proactive approach to improving amenities, footpaths, open spaces, and to make a small contribution to meeting some of the housing needs already identified by the 2016 community survey. I assume the AL Parish Council will probably reject these options and not support any changes to the old village fence. A 'fence' which follows the line of previous unregulated 1930's et al. developments and random infill projects will be the preferred option: there is no positive plan, only a plan to do as little as possible.</p>	
P Chedgy		<p>In order to prevent ad hoc and inappropriate countryside development, our local settlement boundaries need to be rigorously maintained to avoid our local villages and hamlets merging together. Indeed, NSC's own Landscape Character supplementary guidelines support the preservation of the character and landscape of individual villages. This principle is already being stretched by the two significant developments in Langford and elsewhere and, as indicated above, implementation of the Proposed Development would ride roughshod through it.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Pegasus (D Millward)	Pegasus Group	<p>Settlement Boundaries (page 23)</p> <p>2.22 The Council also is consulting upon two options regarding the review of settlement boundaries and the current flexible approach to development adjoining the settlement boundary.</p> <p>2.23 Accordingly, our preference is Option 1 that existing boundaries should be adjusted to account for any existing or proposed allocations and the flexible approach to sites beyond boundaries being retained. It is worth revisiting why this policy was introduced. It was introduced because the Council had struggled to deliver sufficient sites within existing boundaries and a general weakness in the Council's supply trajectory. Given our comments above we consider this is likely to remain to be an issue going forward.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>We agree that there is a need for a comprehensive review of settlement boundaries to reflect the current position and provide opportunities for additional development through new allocations. It is important that settlement boundaries accurately reflect the existing and proposed extent of each village by including allocations within the boundary. The current position of not including new development creates a development management policy anomaly where different policies apply to development which forms part of a settlement depending on whether it was in the 2007 boundary or allocated subsequently.</p> <p>It is also important to review the settlement boundaries affected by the Green Belt to assess potential opportunities. We therefore urge the Council to support our comments on the JSP to include an enabling policy within the plan to enable such a review to take place. That is because NPPF 2018 only permits alternations to Green Belt boundaries through strategic policies ('<i>strategic policies should establish the need for any changes to Green Belt boundaries . . . where a need for changes to Green Belt boundaries has been established through strategic policies detailed amendments to those boundaries may be made through non-strategic policies . . .</i>')</p> <p>We therefore support option 1 to adjust settlement boundaries to include new allocations within the boundaries and retain a policy which allows sites to come forward adjacent to the boundary but not the current policy mechanism. This is a rigid and restrictive standard numerical assessment for all settlements which does not allow for the full assessment of each proposal against the individual characteristics of each settlement. There is a wide variation in the sizes of settlements and also the level of facilities in each of the service villages and infill villages, as well as different opportunities in the three towns. We consider each proposal for development adjacent to settlement boundaries should be assessed against a criteria based policy. We suggest this could include criteria relating to the following:</p> <ul style="list-style-type: none"> • Scale; • Be well related; • Assess transport impacts; • Support employment; • Contribute to infrastructure; • Protect and enhance the environment; • Be identified in the HELAA. 	
Portishead Town Council	Portishead Town Council	<p>Portishead has transport issues which are not being addressed within this document. Welcome and support the work being done to open the railway link but it will not resolve these issues, and therefore other options should be explored to enable access to and from Portishead. Options include easing traffic at MS junction 19 by creating a northbound service station between junctions 20 and 19 and finding another method of crossing the Avon. All new cycleways should become bridleways.</p> <p>Settlement boundaries should at least be co-terminus with residential boundaries, and if amended in Portishead great regard must be given to the Green Belt, the RAMSAR designated coastline to the north, SSSIs, SCAs, the wildlife corridor to the east, ancient woodland of Weston Big Wood, and the National Nature Reserve of the Gordano valley which must be protected and enhanced over the life of the Local Plan period.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Puxton Parish Council	Puxton PC	Please provide a hierarchy with slots for all areas of North Somerset – those with settlement boundaries and those without. This will recognise the possible small scale developmental needs that may well evolve during the plan period, which will be steering us through increasingly complex times.	
R Wood		West end has been classified as part of Nailsea & therefore a Town. It is a small hamlet and it should be classified as Countryside - it is approx 3 miles from both Clevedon & Nailsea and is a farming community	
Rocke Associates on behalf of Mactaggart and Mickel Homes Ltd	Rocke Associates	<p>The SAP Examination Inspector made it clear that settlement boundaries should be adjusted to include new allocations (see Inspector's Report on the Examination of the NS SAP para 105). The need to maintain the current policy which allows sites to come forward adjacent to the adjusted boundaries will depend on the flexibility within the site allocations themselves, and in particular for the release of early phases of development.</p> <p>The essential reason why the Core Strategy Examination Inspector found it necessary to introduce such policy flexibility was due to the considerable reliance on large strategic sites to deliver the overall housing requirement, and the evidence that strategic sites (in particular the Weston Villages) and other allocations were failing to deliver housing at the necessary rate. On the face of it there is little change through the emerging Local Plan given the heavy reliance on large strategic sites, with very substantial infrastructure requirements, and with back-loaded delivery trajectories that indicates little contribution to housing supply until the second half of the plan period.</p> <p>It is also significant that, notwithstanding the recency of the adoption of the Site Allocations Plan, the Council remains unable to demonstrate a five year deliverable supply of housing land. This compounds the need to bring forward additional housing land without delay if legacy of persistent under-delivery of housing is to be reversed.</p> <p>It would therefore appear that the emerging Local Plan contains heightened risks of delivery failures from allocated sites, and therefore the flexibility to bring forward additional sites remains essential. The need to do so, and therefore to realise that flexibility, can be contained by facilitating the phased release of parts of the strategic sites at an early stage. Those sites that are already well advanced in the planning system, and are now incorporated in the emerging strategic development locations, can perform an important role in terms of achieving this flexibility, and therefore reducing the need for additional sites to come forward adjacent to, but outside, the adjusted boundaries. The site north of Youngwood Lane that is included in the Nailsea SDL and the subject of an outline planning application (16/P/1677/OT2) that is now at Appeal, can be brought forward on a solus basis as an early phase to make a critical early contribution to housing delivery. The Council's Statement of Case in connection with the Appeal concerns that the only issue is prematurity, and that there are no material planning objections to the proposals considered on their merits.</p>	
Simon Hegarty		Recent amendments to local policy (CS32) have significantly eroded the efficacy and purpose of settlement boundaries of Service Villages. If rural communities are to be maintained as part of the make up of North Somerset then a rigorous settlement boundary policy should be re-instituted and adhered to.	
SR		We do not support either option when it comes to developing within the Green Belt. We do not agree there should be any assessment in the Green Belt area to allocate sites and review boundaries.	
Strongvox Homes	Strongvox Homes	The revised North Somerset Local Plan will need to plan for the growth targets set out in the JSP (total of 25,000 new homes up to 2036). Of these, 11,000 new homes need to be allocated. Whilst there will be growth directed to a combination of two new villages and extensions to Nailsea and Backell, the new local plan should also pro-actively plan for growth in the larger settlements and, particularly, the Service Villages including Banwell. Banwell supports a range of local facilities and services and opportunities	1.L01.100 location plan.pdf (1.4 MB)

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>exist on the existing village boundary that can provide direct and convenient links to services within the village. The new Local Plan should provide for housing allocations on sites within or adjoining the Service Villages and promote opportunities for housing. The Local Plan should not solely rely on a limited number of new villages (two) and urban extensions to provide the majority of the planned growth.</p> <p>Policy CS32 currently allows for the development of suitable and sustainable sites that adjoin the settlement boundaries of Service Villages provided that such sites are for 25 dwellings or less. This does not allow for larger sites (capable of delivery of greater than 25 dwellings) to come forward where such sites are particularly well located in relation to village centres and have low impacts in terms of design, layout, landscape and other planning considerations. Such a cap can also prevent sites that would otherwise be viable from coming forward - in instances where, due to the presence of abnormal site costs, a developer may not be able to deliver sites with an arbitrary cap of 25 dwellings. Strongvox Homes supports Option 1 but cautions against the new local plan retaining the upper limit of 25 dwellings that is currently stated in Core Strategy Policy C32.</p> <p>On 12th November 2018, Strongvox Homes submitted an application for Outline Planning Permission for 63 homes on land west of Wolvershill Road, north of Wolvershill Park and Knightscott Park, Banwell (Application ref 18/P/4735/OUT). The proposal is well located to the village of Banwell and will not result in any significant adverse impacts on local services and infrastructure. The site provides an excellent example of a development that can provide for the needs of local residents in terms of a mix of sizes of units, 30% affordable homes and is of a layout and form that can integrate well within the village. It provides an example of the type of site that should be considered for inclusion within the settlement limits of a Service Villages - in this case, Banwell.</p>	
Taylor Wimpey - Turley Associates	Turley Associates Ltd	<p>Option 1 is to adjust settlement boundaries to include new allocations within the boundaries and retain the current policy which allows sites to come forward adjacent to the boundary. This is the preferred option for the new Local Plan as it offers the most flexible approach to ensure that a variety of housing sites can come forward. It is important to, as far as possible, allocate specific sites to deliver the necessary non-strategic housing requirement but also to retain in policy the ability for sustainable sites adjoining settlement boundaries to come forward.</p>	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	<p>Q9. What are your views on the options for revised settlement boundaries?</p> <p>2.3 TW support the revision of settlement boundaries to incorporate allocations and would suggest that Option 1 which continues to allow sites to come forward adjacent to settlement boundaries should be retained. This current policy supports a degree of flexibility in housing delivery and allows for the Council to maintain a 5 year land supply. Unless the Council intend to provide a larger quantum of site allocations than the past to enable the market to deliver as envisaged, it is considered prudent to retain this flexibility. The emerging JSP strategy for North Somerset has a high reliance on several large scale SDLs, which in many instances require significant infrastructure investment or have multiple land owners. These issues have the ability undermine delivery and therefore it is important that the NLP has the flexibility to respond to these potential issues.</p>	
Terry Harrold		<p>Settlement boundaries need to be rigorously maintained to avoid</p> <ul style="list-style-type: none"> • North Somerset villages merging together. • To prevent ad hoc, inappropriate development of greenfield sites/countryside. • To preserve the character and landscape of individual villages. North Somerset Council's own Landscape Character Supplementary guidelines supports this view. • People should be encouraged to walk or cycle to work. It is not possible to walk or cycle to the airport, Bristol or W-S-M. 	

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Tickenham Parish Council	Tickenham PC	The Parish Council would be content were the settlement boundary to be removed. The green belt protects the village from large scale development and the Council strongly supports its retention. However, provided current planning policies were met, the Council would not be unsympathetic to some low key development of small dwellings suitable for those wishing to downsize or for young families.	
Tom Leimdorfer		As far as Service Villages and Infill Villages are concerned, Option 2 is preferred, but the settlement boundary revision must take account of emerging as well as adopted Neighbourhood Plans. There should be a mechanism for further boundary revision as new Neighbourhood Plans emerge. The principle should be that development in these villages is plan-led, not reactive to developers.	
Tom Rawlins		<p>We fully support CALRAG's statement that Settlement boundaries need to be rigorously maintained to avoid North Somerset villages merging together.</p> <p>To prevent ad hoc, inappropriate development of greenfield sites/countryside.</p> <p>To preserve the character and landscape of individual villages. North Somerset Council's own Landscape Character Supplementary guidelines supports this view.</p> <p>People should be encouraged to walk or cycle to work. It is not possible to walk or cycle to the airport, Bristol or W-S-M.</p> <p>You have presented this document as if it has already been agreed and this is not acceptable and it is the wrong plan.</p>	
Viv Tomkinson	Congresbury Residents Association Group	Not possible to comment on the suggested options as it is not clear what is meant by "new allocations".	
Wainhomes		<p>2.14. Question 9 of the Issues and Options document seeks views on the options for revised settlement boundaries and asks whether the current policy which allows sites to come forward adjacent to settlement boundaries should be retained. In this respect Option 1 is supported although, through monitoring, the Council must ensure that decisions are not unnecessarily delayed through the development management process.</p> <p>2.15. Page 29 of the Issues and Options document suggests that the Generating Ideas consultation undertaken in November 2017 has informed the further planning of the SDL's although it is not clear what issues were raised or how the Council has addressed them.</p> <p>2.16. Reference is also made to a new infrastructure delivery plan although it is not clear what progress made in relation to the existing IDP and where issues have been experienced.</p>	
Wessex Water (Ruth Hall)	Wessex Water	The supporting text identifies that option 2 is likely to deliver more certainty about where development will go and that allocating sites ensures plan-led distribution of housing and reduces the potential for speculative development. Wessex Water would support the approach outlined in option 2. The development of sites through the plan led process enables infrastructure to be planned and delivered in a timely and coordinated manner.	
Winscombe and Sandford Parish Council	Winscombe and Sandford Parish Council	Option 2 is preferred. As Sandford (in-fill village) in particular has been subject to repeated speculative development outside the settlement boundary, removal of the option to build adjacent to the settlement boundary would prevent 'creeping' and end with villages joining onto neighbouring parishes. It should be noted that as an in-fill village, Sandford should not have been subject to this type of development with infilling only within the settlement boundary permitted. With no new infrastructure in place, or planned, Sandford could only be classified as an in-fill village and the hierarchy for housing development remain unaltered.	

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Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	Wraxall and Lower Failand are the result of disparate ribbon development but have a strong rural character and it would be difficult to draw settlement boundaries that would be readily accepted by residents. The rural character of these areas should be conserved and remain as "Countryside". Failand has been to some extent overdeveloped, such that the only facilities, the Post Office and Village Hall, are at the NE edge of the community, with residents strongly opposed to any expansion of the settlement. Neither Wraxall nor Failand can be classified as "Service Villages". As stated in our response to Q8, W&F PC's preference is to retain the policies in the Core Strategy and its supporting documents that have served our communities well.	
Wrington Parish Council	Wrington Parish Council	Option 2 is preferred. However, if settlement boundaries are to be reviewed to include new developments (including planned and granted applications for developments), then this will provide increased opportunities for land development adjacent to the 'new' developments newly incorporated into the revised settlement boundaries. This would be most unwelcome. Is there a need to revise the criteria for development adjacent to (new) settlement boundaries?	
Wrington Village Alliance		Settlement Boundaries - we support Option 2 - the current strategy is adequate.	
wwarden		<p>I see little sense in adjusting settlement boundaries, especially if there is any consideration then to be given to potential development outside any revised boundary. At the same time, the existing boundaries were agreed some time ago and are accepted. Any revision without prior agreement would probably result in argument, possibly even within families, which should not be considered.</p> <p>Of the two options offered I would prefer Option 2, although only where this includes existing developments and permissions. It should not be NSC's role to include third party land as an 'allocation' just because it is felt that at some point in the future in might be developed. If the landowner doesn't agree then nothing should be included as an 'allocation'.</p>	

Document Part Name What is proposed for North Somerset?

Respondent Name	Respondent Organisation	Comment	Attached documents
Ann Gawthorpe		<p>1. The formation of 'garden villages': these are described as being attractive communities in rural areas with lovely houses and a community feeling. We already have areas like this in North Somerset eg Claverham, but the plan proposes that the settlement bounday could be extended to incorporate more housing than the 75 already agreed on the old factory site. This goes against the Village Plan, which should carry some weight. I have no problem with 'garden villages' but keep existing villages as attractive communities as well.</p> <p>2. The proposed 'garden villages' are in the wrong place. it doesn't matter how attractive they are the residents will still have to commute along already busy roads, adding to the congestion. Any proposed bypasses are years into the future if they happen at all.</p>	

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		<p>3. The only viable site for a 'garden village is in Long Ashton. Why are all the proposed sites in this area coloured red designating them as being discounted for development. This is where the housing should be, close to employment. The plan proposes increasing employment opportunities south of Bristol so that's where the houses should be.</p> <p>4. Claiming that this land is in the green belt and cannot be built on won't wash because one of the proposals in the plan is to take Bristol Airport out of the green belt to allow development. If the green belt round the airport can be redesignated so can the land south of Bristol.</p> <p>5. Park and ride: to encourage commuters not to drive into Bristol any new park and ride facilities should be much further south ie the Backwell/Nailsea area. While there is a train station there it is already stretched in the rush hour and can't cope with additional passengers.</p>	
Avon Wildlife Trust	Avon Wildlife Trust	<p>Thank you for the opportunity to comment on the published Issues and Options Document for the North Somerset Local Plan to 2036. Please find attached responses on behalf of Avon Wildlife Trust</p> <p>Avon Wildlife Trust (AWT) welcomes the commitment by the West of England's four Unitary Authorities to a joint approach to housing, employment and relevant infrastructure provision via the Joint Spatial Plan (JSP). For habitats, wildlife and functioning ecosystems, a joint approach is logical given that protection of biodiverse areas and important species requires a landscape-scale approach, recognising the importance of connectivity. The JSP has the potential to be a key tool in reversing the trend of biodiversity loss across the region and provide a national example of the way in which the environment and biodiversity can be put at the heart of the planning process. As such Avon Wildlife Trust are entirely supportive of this process and recognise the hard work that has been put in by North Somerset Council to enable this to occur. The North Somerset Local Plan will sit within the framework laid out by the JSP and many of the issues highlighted here have been raised by AWT in our previous responses to the JSP consultation.</p> <p>In summary, we remain concerned about the ecologically sensitive location of some of the proposed SDLs and related road infrastructure. Furthermore, the North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document has not been referenced. This is a very positive piece of planning guidance and it is extremely important that it is used to shape planning decisions across North Somerset. We would welcome transparency about how this document has been applied to support sustainable development as described in the Local Plan 2036.</p>	
B Moss		<p>Consult with the Ecological Land Trust and Ecomotive if you want to achieve this.</p>	
Backwell Parish Council	Backwell Parish Council	<p><u>SECTION 4. GARDEN VILLAGES AND NEW COMMUNITIES (pages 28-61)</u></p> <p>In response to the explanatory text within Section 4, BPC makes the following observations in respect of the proposed allocation of new communities:</p> <p>At page 29 it states that <i>“at this stage the specific boundaries of the development are not confirmed...the potential capacity of the locations will vary in relation to the extent of developable land identified and assumptions about densities.”</i></p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>With reference to our comments in response to Question 3 above, BPC questions the role of the Local Plan to test the capacity of the new communities to accommodate the housing allocation for the Strategic Development Locations (SDL). Whilst it is fully recognised that the Local Plan will be tasked with identifying the extent of land required for allocation, the capacity of the SDLs should be fully tested through the JSP to ensure an allocation can deliver the housing numbers and fund necessary infrastructure in a timely manner.</p> <p>In response to the explanatory text within Section 4, BPC makes the following observations in respect of the proposed allocation of new communities:</p> <p>At page 29 it states that <i>“at this stage the specific boundaries of the development are not confirmed...the potential capacity of the locations will vary in relation to the extent of developable land identified and assumptions about densities.”</i></p> <p>With reference to our comments in response to Question 3 above, BPC questions the role of the Local Plan to test the capacity of the new communities to accommodate the housing allocation for the Strategic Development Locations (SDL). Whilst it is fully recognised that the Local Plan will be tasked with identifying the extent of land required for allocation, the capacity of the SDLs should be fully tested through the JSP to ensure an allocation can deliver the housing numbers and fund necessary infrastructure in a timely manner.</p> <p>Nailsea and Backwell Transport Schemes (pages 30 – 31):</p> <p>Notwithstanding BPC’s objections in principle to strategic growth at Backwell and SW Nailsea and the associated transport infrastructure, BPC supports a phased delivery of infrastructure in parallel with the build-out of the housing schemes. The enhancement of the railway station and provision of cycle and pedestrian links from the SDLs is welcomed, although BPC questions how improvements to the railway station would in practice increase capacity of rail services which are already under stress. This needs to be clarified through the JSP process.</p> <p>The delivery of a new highway link from the railway station to the A370 near Farleigh is proposed as part of Phase 1 works, presumably alongside the proposed MetroBus route to Long Ashton Park and Ride. The early delivery of the MetroBus would be vital to encourage sustainable travel habits among new residents and achieve a shift to public transport and any housing allocations at Backwell and Nailsea should be predicated upon its early delivery.</p> <p>The delivery of a road link through the Nailsea SDL would not be achieved until the fourth phase, following improvements to the highway network around Nailsea. BPC question the purpose of the road link in the context of the strategic infrastructure. A distributor road around the outside of the Nailsea SDL would be capable of accommodating heavy goods vehicles, whereas an internal route would presumably be designed to serve the new housing development and therefore accommodating lower traffic flows. Although BPC would welcome any planned infrastructure capable of relieving congestion on the A370, a proposed road link via the SW Nailsea SDL to the A370, with the potential to connect to the M5 at junction 20, would simply encourage higher volumes of traffic onto the local roads and ultimately onto the A370, thereby exacerbating traffic volumes into Bristol. This will have a significant impact on the villages of Farleigh and Flax Bourton, not just Nailsea and Backwell. BPC has raised serious concerns regarding the impact of the proposed road link south of Station Road, upon the local landscape, strategic gap, areas at risk of flooding and biodiversity.</p>	
Burrington Parish Council	Burrington Parish Council	<p>Some of the proposed locations for Garden Villages are poorly conceived in terms of location, scale and access to facilities, particularly at Churchill. The proposed Churchill SDL could never function as a freestanding settlement, because of its size, location, unavailability of local employment, transport and other facilities. It is also at the bottom end of the scale according to Government criteria. However, the Local Plan concept is not integrated with neighbouring villages either.</p>	
C Twine		<p>Garden Villages and New Communities</p> <p>4.20 Our broader view, and in line with our comments above, is that there remain serious question marks over their ability to deliver the proposed quantum of housing over the current plan period at several the SDL’s particularly those within North Somerset. This is due to the significant up-front infrastructure costs and long lead in times</p>	

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		associated with strategic development on this scale. As such, the new garden villages will need to be coupled with a flexible and sensible approach to development on smaller, non-strategic sites that can be delivered in the shorter term.	
Congresbury Parish Council	Congresbury Parish Council	<p>Our overall response to the issues raised, is our concern about the lack of details as to how North Somerset Council will co-ordinate and fund the infrastructure requirements for the new garden villages. Our objections to these proposals are based on:</p> <ol style="list-style-type: none"> 1. The destruction of rural areas that are environmentally and ecologically important and the permanent damage would be impossible to mitigate against 2. Other alternative sites are available, that have not been assessed 3. Lack of a strategy to serve infrastructure serving the garden villages and the impact on existing network 4. The impact on residents due to greater urban development of the countryside 5. Increased pollution and the increasing risk of flooding due to large areas of green land being turned into non-permeable surfaces 	
Cresten		The Garden village concept relies on a countryside setting. The area available for the Churchill SDL is inadequate and a stand-alone settlement cannot be achieved, as the boundary will be no more than a field or two away from Sandford, blighting the countryside context of two established settlements, Sandford and Churchill, protected wildlife habitat, valued farmland. There are doubts expressed about its viability in the JSP studies, and there will be no secondary school in the settlement. The Sandford/Churchill SDL is a seriously flawed scheme, even in outline..	
Diane		<p>Nailsea and Backwell Transport Schemes (pages 30 – 31):</p> <p>I strongly object to proposed new highway link between Station Road and the A370 [E3]. This route runs across green belt, sensitive landscape, prime agricultural land, wildlife habitat and very close to nature reserves (Backwell Lake, Backwell Common and Trendlewood Park). it runs right through the strategic gap between Nailsea and Backwell and in close proximity to established residential areas – the impact on local residents would be enormous. The intersection of the route with Station Road would lead to significant incremental congestion and pollution due to standing traffic waiting for right of way. The increased traffic, and the need to negotiate the junction, would substantially increase danger to pedestrians and cyclists, particularly students at Backwell primary and secondary schools and Nailsea commuters using the station. Please see my comments below on the concept diagram for Nailsea and alternative options.</p> <p>I support the removal of the previously proposed routing which passed close to the Tyntesfield estate to join the Long Ashton bypass near Flax Bourton. I believe this would have had a major adverse impact on this heritage site which could not have been adequately mitigated.</p> <p>If despite concerns, the proposal for new highway [E3] is upheld, I believe the proposed timing within the first phase is massively premature. In view of the previously identified challenges associated with [E3], coupled with the fact that the highway link within the Nailsea SDL [W3] is not to be constructed until the fourth phase, I propose that the highway [E3] should be moved to the fourth phase, to coincide with the highway link [W3], which will feed traffic into it. Metrobus services, if required prior to phase four, should use the existing highway via Station Road and the A370 and hence would act as a pilot scheme to test commercial feasibility of and consumer appetite for such a service before embarking on the challenges of constructing a new dedicated busway with all the challenges that this entails.</p> <p>I do not support the development of the existing Nailsea and Backwell station as a transport hub. The current station is very small and basic and there is very limited scope to improve the facilities in its current location. If the proposal to develop to the South West of Nailsea is upheld, I support relocating the railway station to a new site further west, closer to the Nailsea and Backwell SDLs, where space is less constricted and it is more feasible to establish a transport hub, with appropriate walking/cycling and bus connections. This would also facilitate improvement of the rail service by providing longer platforms and lift/disabled access and extended parking.</p>	

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		<p>I specifically oppose the development of a multi-storey car park at the existing Nailsea and Backwell station. This would result in unacceptable visual intrusion into the landscape, including light pollution. I do not believe the impact of this could be adequately mitigated.</p> <p>I support the removal of the previously proposed highway link across the SSSI between Nailsea and the M5 at Junction 20, and the previously proposed link from the Nailsea SDL to the A370 west of Backwell. Both of these would have inappropriately funnelled through traffic into the constrained and sensitive gap between Backwell and Nailsea.</p> <p>In principle I support improvements to the existing highway network to the M5 at junctions 19 and 20 [N1 and W10]. However, improvements to Portbury Lane [N1] will need to be designed carefully so as to avoid adverse impact on the sensitive landscape through which this route passes.</p> <p>Improvements to the T junction between Portbury Lane and the B3128 are already urgently required and the addition of traffic lights would be welcomed.</p> <p>I support the proposal to add a new highway link between Hanham Way and the B3130 [W4]. However, given that the land off Causeway View and the land off Engine Lane are already allocated for development in the plan to 2026, it seems appropriate to bring this link forward from the second to the first phase. The alignment of this route and mitigation measures need careful consideration to avoid adverse impact on Tickenham Church and its setting.</p> <p>I support the proposal to add a new highway link between the B3130 and junction 20 [W5]. This seems a relatively straightforward development which would have an immediate positive impact on traffic flows and local residents, so I would like to see it brought forward to the first or second phase.</p> <p>This should link to the new road which I assume will be required through the development off Causeway View in the site allocations to 2026, emerging either onto Pound Lane or directly onto Clevedon Road near the fire, ambulance and police stations (NB please add this road to the concept diagram) and an onward link from Clevedon Road to the B3130 Nailsea to Wraxall road, which will also serve the industrial estates and improve the routings for fire appliances, ambulances and police vehicles, taking this inappropriate traffic away from Nailsea town centre.</p> <p>I object to the proposed highway link within the Nailsea SDL [W3], particularly the section of the route which is proposed to pass through the gap between Nailsea and Backwell railway station and Backwell Lake. Space in this area is very constrained, so the route would inevitably run very close to the Lake, resulting in significant adverse impact on the setting of this nature reserve.</p>	
EWH	Edward Ware Homes	<p>Garden Villages and New Communities</p> <p>4.14 Our broader view, and in line with our comments above, is that there remain serious question marks over their ability to deliver the proposed quantum of housing over the current plan period at a number of the SDL's particularly those within North Somerset. This is due to the significant up-front infrastructure costs and long lead in times associated with strategic development on this scale. As such, the new garden villages will need to be coupled with a flexible and sensible approach to development on smaller, nonstrategic sites that can be delivered in the shorter term.</p>	
Graham L		<p>Unless there is a proven case for large scale new employment opportunities in the proposed 'Garden villages and new communities', the proposal will result in significant additional traffic on the roads between these communities and the major employment centres like Bristol and Weston. The current road network in these areas is mainly 2 lane carriageways, already suffering from traffic congestion in peak periods and when there is disruption on the M5. Plans to include 'bypass link roads' to the main A roads will do nothing but increase the congestion on these A roads, adding to greater travel times, increased pollution and massive frustration for road users.</p> <p><u>There needs to be an environmentally friendly consideration for the overall plan</u>, which I cannot see within the proposals. Surely it is better to develop housing nearer to the employment areas, where there can be easy additions to metro links, etc. The Vale between the A370 and A38 on the edge of Bristol seems an ideal solution.</p> <p>The whole idea of these 'Garden Villages' is premature as the Joint Spatial Plan is not approved.</p>	

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Highways England	Highways England	<p>Strategic Development Locations – Nailsea, Backwell, Banwell and Churchill</p> <p>To address the issues raised in respect of the 7 broad development locations set out within the I&OD, and in accordance with the emerging JSP Strategic Development Locations (SDLs), the I&OD identifies four strategic locations for development; two new ‘Garden Village’ developments at Churchill and Banwell, and two new communities at Nailsea and at Backwell.</p> <p>The I&OD refers to the JSP evidence base, which included templates for each of these locations and information on factors such as transport and infrastructure requirements. The I&OD notes that the detailed proposals for the four SDLs will be refined and developed through the local plan process, taking into account any changes resulting from the JSP examination process.</p> <p>Highways England is currently preparing a response to the JSP revised evidence base consultation, which concludes in January 2019. However, we note that the I&OD identifies that a range of infrastructure, including transport infrastructure, will be required to unlock the developments and will be supported by an Infrastructure Delivery Plan setting out and prioritising the infrastructure requirements and how they will be funded. This should build on the infrastructure planning and transport studies carried out for the JSP, including the Joint Transport Study and Options Appraisal Reports.</p> <p>The I&OD provides two plans ‘Plans A and B’ taken from the Joint Spatial Plan, which set out transport schemes for the Plan area to accommodate strategic developments. The document notes that scheme development is subject to ongoing technical assessment (through the emerging JSP) and that a revised JSP Transport evidence base will be consulted on in November 2018. It is also noted that the schemes, which include link road between M5 J20 and Nailsea, and a potential location for M5 J21a, are identified with the purpose of facilitating growth at the four SDLs. However, we are concerned that Plans A and B include highway schemes that have been assessed by the JSP (revised evidence base November 2018) as not being necessary to mitigate the SDLs.</p> <p>The I&OD notes that option development has identified the potential need for a direct highway link between Nailsea and the M5 at junction 20, which may be required towards the end of the Plan Period, subject to further assessment. The JSP, whilst concluding a new link was required in previous assessments, has now concluded (November 2018 evidence base) that a new link is not required, but a series of more local ‘A’ road improvements would accommodate the additional traffic demand generated by the SDLs. It therefore seems at odds with the JSP assessment and Page 6 of 8 conclusion to include these proposals, albeit identified as a long term proposals, in the I&OD. We would suggest that such a strategic proposal would require testing and concluding as necessary at the strategic JSP level prior to inclusion in the subsequent detailed Local Plan. That is, a new link between Nailsea and M5 J20 would have benefits and disbenefits for both the SRN and the local road network over a wide area. Hence, it is suggested that the assessment of schemes that support strategic growth (the SDLs) should take place through development or revision of the strategic plan (the JSP).</p> <p>In section 4.1, which considers the proposed JSP Banwell allocation, there is reference to a new M5 J21A. This is no longer included in the JSP (November 2018) mitigation strategy, and thus is assumed to not be required to support development in the Local Plan.</p> <p>Section 4.2 considers the proposed JSP Mendip Spring allocation (formerly known as the Churchill allocation). It is described as being located between the proposed M5 junction 21a and A38. It is noted that the proposed M5 junction 21a was included in the JSP Transport Strategy, but following more assessment reported in the JSP Transport Topic Paper (November 2018) the scheme has been removed. Hence, the JSP (November 2018 evidence) has concluded that the Mendip Spring allocation is no longer reliant on the opening of a new M5 junction.</p> <p>There is a clear inconsistency between the development strategy in the emerging local plan and the revised evidence base supporting the emerging JSP in respect of necessary transport schemes/mitigation. Highways England would welcome clarification in this respect.</p>	
Jan Murray	CALRAG	<p>3. Section 4. (p 28) Garden Villages and new communities.</p> <p>3.1. This section is full of airy descriptions of utopian ideals. The reality is very different. It is interesting to note the Sustainability Assessment Scoping</p>	

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		<p>report that should feed into the Issues and Options consultation asks of each plot of land put forward in this area, "Are there any specific site circumstances e.g. abnormal costs, high infrastructure costs, low value land that might affect site viability?" The answer given was "No". This is quite simply absurd. The transport infrastructure and mitigation of pluvial flood on the land alone create 'abnormal building costs'.</p> <p>3.2. Public transport by bus to Bristol jobs will take too long to be viable.</p> <p>3.3. By train, residents will need a car to get to Yatton Station which means increased traffic on Stock Lane and crossing the A370 onto the B3133 to go through Yatton. Where are the plans to:</p> <p>3.3.1. Mitigate the already congested (at peak times) junction of the B3133 at Congresbury?</p> <p>3.3.2. Increase parking at Yatton Station to accommodate those living in the Churchill/Mendip Spring dormitory town that NSC will have created?</p>	
jerb44		<p>It is difficult to envisage an affordable transport infra structure that would render the proposed housing sites remotely sustainable. The transport proposals mentioned by officers at public meetings appeared to be very limited and completely unfunded in the proposed timescales.</p>	
JLS		<p>The proposal at Mendip Spring does not meet the criteria of a garden Village. It is naïve to assume that it would function independently and would just become another dormitory housing estate.</p>	
Lands Improvement		<p>7. GARDEN VILLAGES AND NEW COMMUNITIES</p> <p>7.1 Our broader view, and in line with our comments above, is that there remain serious question marks over their ability to deliver the proposed quantum of housing over the current plan period at several the SDL's particularly those within North Somerset (e.g. Banwell and Churchill).</p>	

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		<p>7.2 The Garden Villages and Communities identified are very large allocations and at this stage only very limited detail has been provided by the JSP as to what exact land parcels these sites consist of (only high-level detail is provided within the Development Locations Template document). It is reasonable to assume that given the size of these opportunities will suffer from fragmented land ownership which will slow the speed of delivery assuming that most owners are willing to bring land forward.</p> <p>7.3 A further concern is the significant up-front infrastructure costs (estimated at more than £1 billion) and long lead in times associated with strategic development on this scale. Such infrastructure is likely to be needed early on to enable delivery and until this is in place delivery will be slow.</p> <p>7.4 Although much smaller in scale, the build out of the Weston Villages Strategic site has been slower than anticipated, partly due to infrastructure delivery</p> <p>7.5 As such, the new garden villages will need to be coupled with a flexible and sensible approach to development on smaller, non-strategic sites that can be delivered in the shorter term.</p> <p>7.6 We consider a greater emphasis should be placed on non-strategic opportunities instead of the over reliance on large complex new settlements. As a result, a great proportion of units would be delivered earlier in the Plan period. Such an approach would be consistent with the ethos behind the Housing Delivery Test which requires consistent housing delivery over a three year period.</p>	
Margaret Munro		<p>I object to proposals for new house building on green field sites as it is most unlikely that there will be local employment that matches the scale of population living in new homes in North Somerset Villages. The consequence will be more dependency on the car, pollution and congestion as population travels to the main centres of Bristol and Weston-Super-Mare for work, shopping etc. The proposals represent total loss good aricultural lanof beautiful countryside in the areas proposed for house building. New housebuilding should be adjacent to Weston and Bristol (The Vale) where thers is employment and transport infrastructure. In the case of The Vale, Long Ashton I am in favour of allowing exceptional development of green belt</p>	
Matt Griffith	Business West Chambers of Commerce and Initiative	<p>There is a notable contradiction between the approach taken by North Somerset and the West of England authorities in their treatment of the spatial treatment of housing locations and the rationale used by North Somerset around employment locations. For example, this North Somerset Issues and Options paper and Employment Land Review says that consideration should be given for additional employment “on sites closer to Bristol to capitalise on opportunities provided by infrastructure investment and the economic growth prospects of Bristol” (North Somerset Local Plan 2036: Issues and Option Paper, page 71). Yet this rationale appears not to apply to housing development.</p> <p>There is also a tension between the approach to spatial locations set out in the Local Plan and the JSP and the language and aims of the Local Plan on transport and sustainable development.</p> <p>For example, the draft recognises “the proposed growth in the JSP presents the challenge of having to mitigate for increasing demand on the transport network” (page 80). The draft also recognises the high costs of current congestion and the forecasts for these costs to more than double in the plan period from £300 million currently to £800 million by 2036 (page 80). The plan also recognises the central role of transport emissions in improving air quality and tackling climate change (page 81).</p> <p>Yet these clear Local Plan aims and issues have not merited an assessment of what chosen or alternative spatial locations means for transport mitigation costs, congestion costs and levels and carbon emissions.</p> <p>For example, the Local Plan does not set out how spatial locations, and their alternative options, would help to demonstrate how the Plan could contribute to meeting the target of a 50% reduction in carbon emissions by 2035, as required by the Climate Change Act of 2008 (page 88).</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Matt Griffith	Business West Chambers of Commerce and Initiative	<p>We believe many of the current proposal Strategic Development Locations set out in the JSP cannot be made sufficiently sustainable, when compared to others which could have been reasonably included. This view is supported by the West of England’s own transport assessments and by its most recent Consolidated Sustainability Appraisal.⁵⁶⁷⁸</p> <p>We believe the current JSP and the concentration of Strategic Development Locations ‘beyond the green belt’ will lead to a significant diversion of financial resources, which the West of England estimates at £2 billion, including £1.8 billion of public subsidy, towards transport investment that would be better spent elsewhere and which would be better able to support economic growth in the region.</p> <p>The transport testing of strategic options set out in the appendices to the JSP Transport Topic Paper (November 2016) concluded with two key principles (p40), namely that:</p> <ul style="list-style-type: none"> • “Firstly, sites closer to the urban area are, in general, easier to serve with good quality transport options” • “Secondly, many of the sites located beyond Green Belt have relatively poor travel choices and therefore pose challenges in improving travel choices and mitigation of their impacts”.⁶² <p>These findings by the West of England’s transport consultants, and contained in the West of England’s own transport topic paper, are highly critical of the ‘beyond the green belt option’. The WoE JSP Transport Topic paper concludes that:</p> <p>“Test 1 [building beyond the green belt] has fundamental challenges. Locating development beyond the Green Belt results in large volumes of travel on sub-regional corridors, with poor travel choices in many cases. The road network has a number of capacity constraints, causing serious congestion problems at a number of locations. Particular problems are forecast at Yatton, Nailsea, Bristol Airport and routes from the Somer Valley to Bristol. In particular, the testing has forecast high volumes of traffic using M5, which will be difficult to mitigate. It is possible to implement measures to promote good travel choices and mitigate impacts, but the fundamental challenges of longer-distance travel remain. The mitigation package for Test 1 is estimated to cost ~£2.0 billion: this is the most expensive of the three tests, and even then the mitigation package cannot fully address the journey time impact of the developments in this test.” (Page 40)</p> <p>Additional findings in the West of England’s JSP transport topic paper⁶⁴ found that:</p> <p>? “The costs [for building beyond the green belt] ... are higher because significant infrastructure is needed to improve travel choices and mitigate the impacts of longer distance traffic”. (Page 38)</p> <p>? “This ... generates significant long distance travel, including traffic on the M5, which will be difficult to mitigate.” (Page 30)</p> <p>? “There are significant numbers of trips on key routes, for example A370, A371, A38, A37, A39, A362, A367, B3116, A4 (East), A432 and B4058. The M5 is used by traffic from Yatton/Congresbury and Clevedon via Junctions 20 and 21. ... These routes would experience increased traffic delays, particularly at junctions.” (Page 30)</p> <p>? “Overall, the traffic impacts of this [for building beyond the green belt] ... will be difficult to fully mitigate due to the long travel distances to key destinations.” (Page 31)</p> <p>? “The proposed mitigation packages are substantial ... This is particularly the case for Test 1”. (Page 39)</p> <p>? “Test 1 showed the largest increase in journey times across the network before mitigation is applied.</p> <p>This is due to the relatively long distances between new housing and key destinations, together with significant congestion impacts on the network. Tests 2 and 3 showed much lower increases in journey times before mitigation is applied. This is due to shorter distances between new housing and key destinations and more concentrated congestion impacts.” (Page 39)</p> <ul style="list-style-type: none"> • However, in the case of Test 1, it was not possible to fully mitigate the impacts and overall journey times would be slightly higher” (Page 40) <p>These transport studies were followed by a Transport Topic Paper in April 2018, a Transport Topic Paper 8 (Update) in November 2018 and alongside it, an Emerging Findings Transport Report, also November 2018. The publication of these later documents do not undermine our concern about the sustainability of some SDLs or the need for a thorough Green Belt review to assess more sustainable development through either Scenario 2: ‘Concentration at Bristol urban area’ and also Scenario 3: ‘Transport focussed’ as set out in the Consolidated Sustainability Assessment. 101112 13</p> <p>We also believe the current JSP will lead to less resources being available from land value capture, thus making it harder to pay for infrastructure requirements or support the West of England’s ability to deliver the affordable housing it needs. This is backed up by our concerns over the recently published West of England Updated Viability Assessment.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Mendip Hills AONB unit	Mendip Hills AONB Partnership	<p>Regarding the 4th para on p.28, the SDLs (strategic allocations) are still to be tested through the Joint Spatial Plan examination. As set out in our comments dated 8 January 2018 to the Joint Spatial Plan consultation, we have strong concerns regarding the allocation of the proposed Banwell and Churchill garden villages.</p> <p>With regards to the Banwell and Churchill transport schemes, any considerations must have regard to the purpose of conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within an Area of Outstanding Natural Beauty. Potential development proposals outside of the boundaries of AONBs that may have an impact within the designated area are also covered by the 'duty of regard'.</p> <p>The wider implications of the transport schemes must be considered. There will be a cumulative impact on the wider road network system; one of the issues impacting on the Mendip Hills AONB is that routes across the AONB are frequently used as short cuts by through traffic, affecting both tranquillity and the environment of the nationally protected landscape. A further consideration will be the impact of lighting on the protected landscape.</p> <p>Policy D2 under the Development and Transport Objectives within the adopted Mendip Hills AONB Management Plan 2014-2019 sets out 'ensure that the special qualities of the AONB are fully respected in the planning, design, provision and management of all types of transport and associated infrastructure'.</p>	
moore@		<p>It is inappropriate for the council to be consulting further on these proposals when there are significant issues that have been raised via the JSP consultation, which is still with the Independent Inspector. Within that I also specifically object to any proposal to create a "Green Village" at Churchill, as there is no way to create a sustainable and economically viable new settlement at this site.</p>	
Pegasus (D Millward)	Pegasus Group	<p>Garden Villages and New Communities (page 28)</p> <p>2.24 Our broader view, and in line with our comments above, is that there remain serious question marks over their ability to deliver the proposed quantum of housing over the current plan period at a number of the SDL's particularly those within North Somerset. This is due to the significant up-front infrastructure costs and long lead in times associated with strategic development on this scale. As such, the new garden villages will need to be coupled with a flexible and sensible approach to development on smaller, non-strategic sites that can be delivered in the shorter term.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>Garden Villages and New Communities (General Comments)</p> <p>The garden village and new community proposals are predicated on the adoption of JSP, which has yet to be examined and so these are at an early stage which can only attract limited weight. In addition, Inspectors' have raised significant issues about the evidence underpinning strategic development locations and the level of detail in the JSP</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>policies. This will affect how these proposals need to be taken into account in the Local Plan. In view of this and in advance of the examination whilst recognising the locational rationale for these proposals we are not making any specific comments on each location at this stage.</p> <p>Another key issue in delivering these proposals relates to the infrastructure requirements that are necessary, particularly transport. In particular Policy 7.5 of the JSP for Banwell garden village is that <i>'development will not commence until the construction of the Banwell by-pass is delivered as part of the M5 to A38 highway improvements, with connection to a new M5 junction 21A at a location to be confirmed and onward connection to the Sanford/Churchill by-pass.'</i> However, that has been considerably watered down and the requirement reduced in the Issues and Options document which now refers to <i>'a number of <u>potential</u> connecting highway links . . . and a <u>possible</u> additional junction on the M5'</i> (our emphasis) and confirmed in the proposed changes to the JSP.</p> <p>For Churchill garden village JSP Policy 7.6 says <i>'the key strategic principles and infrastructure <u>requirements</u> include a package of highway schemes including a new junction'</i> (our emphasis, clearly demonstrating that the infrastructure is a requirement to enable the development).</p> <p>Plan B illustrates how the new transport proposals might look but now these clearly need to be assessed against a scenario of no new M5 junction or a substantially delayed M5 junction.</p> <p>Policy 7.7 Nailsea, not modified by the JSP changes says <i>'development to be mitigated with the delivery of'</i> including a new multi-modal link from the A370 to the station, connections between Nailsea and the A370 and a new or improved connection to the M5 including a Metrobus link. However, Plan A of the Issues and Options document shows only a potential new link between Nailsea and Clevedon and as, an alternative, limited improvements at Clevedon and Stone Edge Batch with the remainder of the route being the existing road through Tickenham village. In addition the package of improvements to link Nailsea with Backwell and the A370 requires two new railway crossings, the timing, cost and feasibility of these proposals need to be assessed to provide the mitigation to the development proposals required by JSP Policy 7.7.</p>	
Peter Burdge	Mr	<p>There does not appear to be provision for leaving comments specifically on the Nailsea and Backwell transport proposals. As a resident of Tickenham well used to the traffic problems at the Jacklands/Stone Edge Batch section of the B3133 I suggest a minor relief road from Jacklands to near where Washing Pound Lane joins the B3133. This would eliminate the bottle-neck and the dangerous bends. The only sensible major remedy is the construction of the proposed link to Junction 20 of the M5, which I believe was the idea when the motorway was first planned, and was kept as a proposal for some years as the Tickenham bypass, before being abandoned.</p>	
R Waycott		<p>Inspectors looking at the JSP, have already identified significant weaknesses in the approach taken with regard to promoting Strategic Development Locations, without having carried out the necessary landscape, environmental or ecological studies.</p> <p>Development and infrastructure across known bat habitat and feeding sites, particularly around Nailsea and Backwell is contrary to existing and emerging Policy.</p>	
S Moore		<p>Development should be focused on sites close to existing transport links, jobs and amenities. The garden village concept is deeply flawed - particularly at Mendip Spring - and will create dormitory housing estates for people commuting along congested roads into Bristol and Weston. This is not a sustainable approach to development, and does not make sense from an environmental, social or economic perspective. The infrastructure and transport work done so far does not alleviate these concerns.</p>	
South Bristol Business (M. Knight)	South Bristol Business	<p>South Bristol Business supports North Somerset Council plans to increase housing provision in line with the requirements of the West of England Joint Spatial Plan, which in turn responds to Government policy to address the Nation's housing shortage.</p> <p>We note Council Plans to create Garden Villages and new communities at Banwell Garden Village, Churchill Garden Village, Backwell and Nailsea. We have further noted in media reports the concerns of local people to the four proposed developments.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>There is an Alternative ready and waiting and a start to developing “North Somerset / South Bristol” Border Economic and Wealth Creation co-operation.</p> <p>Sustainable Communities. “The Vale”</p> <p>We support the planning concept of providing new housing and employment opportunities as near as possible to each other. We therefore suggest, that as part of this Plan process, a further review and reconsideration be taken by the Council to the private sector development proposal “The Vale” to create in a phased manner, a new community, of three close-by villages, situate on the North Somerset / South Bristol borders.</p> <p>We understand the “The Vale” Development will provide:-</p> <ul style="list-style-type: none"> • Phased construction of 4,500 homes including significant proportion of affordable homes. • Allocation of 8Ha (20 acres) of dedicated employment land (which could accommodate 1m sq ft of office space or other combination of employment opportunities) on much needed Employment Land. Furthermore by its location, possibilities for additional and ancilliary employment opportunities (retail / hotel/ education / workspaces). • Location off the South Bristol Link, making an early economic return on the substantial regeneration investment made by Government in the funding and constructing of South Bristol Link. 	
Taylor Wimpey - The Vale		<p>Additional Response: Garden Villages and New Communities</p> <p>1.14. The consultation document takes the approach of “rebranding” the Banwell and Churchill SDLs as ‘Banwell Garden Village’ and ‘Mendip Spring Garden Village’.</p> <p>1.15. However, neither the proposed Banwell or the Churchill SDLs meet even the majority of the criteria for such a description, let alone all of them, as set out in the Ministry of Housing, Communities & Local Government’s (MHCLG) Garden Communities document (August 2018).</p> <p>1.16. The most obvious failures are in relation to the “locally-led” and “deliverability and viability” criteria. With regard to the former, the Garden Communities criteria emphasises the importance of local engagement and support, however, there is significant local opposition to the proposed Churchill SDL in particular.</p> <p>1.17. With regard to the latter, as explained in our previous JSP representations (see paragraphs 50 to 78 Appendix 2), these proposed SDLs cannot be considered deliverable due to the complex and fractious patterns of land ownership, the significant infrastructure costs associated with their delivery, insufficient market absorption and inability, based on the WoE authorities’ own evidence, to contribute toward strategic infrastructure and policy compliant levels of affordable housing.</p> <p>1.18. Continued use of the ‘Garden Village’ branding is misleading and should be removed.</p> <p>Q10. to Q18. Banwell Garden Village and Mendip Spring (Churchill Garden Village)</p> <p>1.19. As highlighted above in the introduction to these representations, given the fundamental nature of our objections to the proposed SDLs at Banwell and Churchill, our response to these questions relates to the principle not the detail.</p> <p>1.20. To avoid unnecessary repetition, we have attached (at Appendix 2) our objections to the proposed Banwell and Churchill SDLs, as submitted to the draft JSP. The key elements of these objections are as follows:</p>	<p>The Vale - Local Plan Issues and Options Repls FINAL w appds.pdf (4.9 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>? The Banwell and Churchill SDLs are fundamentally inconsistent and incompatible with the draft JSP's Strategic Priorities and Vision, as well as being unjustified, ineffective and inconsistent with national policy. This internal inconsistency within the draft JSP is the hallmark of unsoundness and both should be removed as SDLs.</p> <p>? Applying the WoE authorities own Sustainability Assessment Framework criteria to the proposed SDLs at Banwell and Churchill demonstrates that they are not suitable or sustainable locations for strategic scale growth, contrary to national policy and section 39(2) of the 2004 Act and Department for Transport Circular 02/2013.</p> <p>? SDLs at Banwell and Churchill will not facilitate highways improvements and the development itself cannot afford to pay for necessary infrastructure alone. Nor is there any certainty on any public funding sources. Furthermore, they would perpetuate unsustainable car based travel with no credible or viable mitigation measures.</p> <p>? Even if development could be delivered in these locations, the economic / job growth evidence clearly demonstrates that there would be insufficient job growth to maintain the long standing objective of enhancing self-containment in Weston-super-Mare.</p> <p>? New housing at Banwell and Churchill is not needed to meet the future growth needs of Weston-super-Mare as a considerable pipeline of housing land supply already exists.</p> <p>? Even if allocated, Banwell and Churchill are undeliverable during the JSP plan period due to:</p> <ul style="list-style-type: none"> o The complex and fractious pattern of land ownership, with certain landowners expressing a desire not to be involved. Indeed, at Churchill we are aware that NSC have recently halted their attempts to assemble / acquire land that would be necessary. o The significant infrastructure burden required to enable development which would require considerable public sector funding, represents 'low value' for money to the tax payer. o There is insufficient market absorption these locations to deliver the scale of growth proposed. <p>o Based on the WoE authorities' viability evidence, neither proposed SDL would be able to contribute to strategic infrastructure and deliver a policy compliant level of affordable housing.</p> <p>1.21. These matters cannot be overcome and therefore Banwell and Churchill should be removed from the JSP as SDLs.</p> <p>1.22. The Vale is the obvious alternative to development at Banwell and Churchill. A detailed justification is set out in Appendix 1, however, this can be summarised as follows:</p> <p>? The Vale has a long established 'planning pedigree' having been independently endorsed as a sustainable location for release from the Green Belt to accommodate residential led mixed use development as part of the South West Regional Spatial Strategy.</p> <p>? There is a pressing need for strategic development to serve the housing demand emanating from the Bristol urban area and The Vale is ideally located to meet this need.</p> <p>? The Vale performs very favourably in relation to all the criteria set out in the JSP's Sustainability Appraisal Framework, and is a demonstrably suitable and sustainable location for development. Therefore, with exceptional circumstances already identified within the JSP plan area, its removal from the Green Belt is justified.</p> <p>? The Vale is deliverable. Due to a unique set of circumstances, and an outline planning application package in ready-to-submit condition, The Vale can deliver significant residential completions within the first 5 years of allocation.</p>	
Vence LLP		<p>We note that being considered within the framework of Garden Villages and New Communities, Nailsea and Blackwell Transport Schemes section identifies the opportunities to develop new links to the existing metro bus park and ride at Long Ashton. Vence LLP would offer their support to improved links to the Park and Ride in an attempt to maximise the public and sustainability benefits of an enhanced Metrobus system and link between BCC and NSC</p>	

Document Part Name

Q10. Do you have any comments on the proposed vision for Banwell?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex		see below	
Andrew		The JSP must be agreed before this document can be considered. If the JSP isn't agreed, the key roads, especially at Banwell and Churchill, can not be built and therefore the proposed housing at these sites is impossible. I have fundamental objections to the JSP, principally because the proposed development at "Mendip Spring" and the roads at Banwell and Churchill are inconsistent with the objectives of the JSP. Housing development at Ashton Vale would appear to be far more compatible with the JSP objectives.	
Aston	Aston and Co UK	<p>Proposed Vision – Banwell is in an unsustainable location and viability has not been established.</p> <p>For resources to be deployed by NSC if this land is to be assessed, evidence should be sought to demonstrate that land in the Garden Village is available to supply to the market for housing at the rates per hectare used in the viability modelling, namely £100k/ha to £250k per ha.</p> <p>Unless land is forthcoming within the proposed garden village locations at these levels then no development will come forward, or the target affordable housing of 35% or more will not be achieved. The land will likely already be secured under option agreements and evidence to substantiate the valuation figures used should therefore be sought from the relevant landowners by NSC.</p> <p>More work is necessary on the abnormal cost associated with a garden village development. These will be substantial and include:</p> <ul style="list-style-type: none"> • Off-site utility infrastructure reinforcement – power, water, gas, foul water and telecom. • New highway, cycle and public transport infrastructure including M5 connection. • Costs in connection with acquiring the land rights for new infrastructure routes. • The Highways Agency need to supply evidence that the proposed new Junction 21A is deliverable within the plan period to supply the required housing. History suggests that is unlikely. Highways England is currently working through a 30 year backlog of highway projects. <p>Each input will of course affect the development appraisal and viability.</p> <p>Are compulsory purchase powers proposed to acquire and deliver the necessary infrastructure to deliver the target levels of housing within the 20 year plan period? What evidence is there that this can be achieved?</p> <p>A 5% contingency for such early stage development costs is extremely light until feasibility studies are more advanced. 10-20% would be more reasonable.</p> <p>The implications of Brexit on the sales projections and project finance rates needs to be carefully modelled and a wide variety of scenarios tested over a range of delivery timescales once the basic model has been satisfactorily completed. Evidence needs to be supplied to justify abnormal (very low) infrastructure and land acquisition costs.</p> <p>The case has not been presented for all alternative scenarios including distributing the housing at the larger settlements by minor local adjustments to the Green Belt (GB) where the primary purposes of the GB are not significantly affected.</p> <p>It is recognised that in the West of England JSP pre-examination exchange of letters with the Planning Inspectorate that further justification has been supplied for the SDL locations and launched in an overlapping consultation 12.11.18 to 7.01.19 (WED 004 Justification of the SDLs). We will separately review and reply to this consultation.</p> <p>No detailed planning can be undertaken without an up to date Strategic Flood Risk Assessment.</p> <p>We appreciate this is initial scoping and not detailed design but OS based mapping would enable participants to recognise the locations of proposed housing, transport infrastructure etc. Please publish. The diagrams are not as helpful, particularly to engage local people effectively.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Avon Wildlife Trust	Avon Wildlife Trust	Whilst we salute the ambition of the vision for Banwell, we think that that constraints of the site and its relatively poorly connected nature mean it seems to be a uniquely unsuitable location for a further 1,900 houses. It would seem that delivery of this quantum of development and the associated infrastructure would have significant negative impacts on the local environment, many of which would be immitigable.	
Banwell Parish Council	Banwell Parish Council	We agree with the proposed 'Vision' for the Garden Village but have concerns that that the eventual layout and visual appearance is not a twee mock village, (like Poundbury). The last part of the vision relates to the existing village of Banwell as opposed to the vision for the Banwell Garden Village (as per the heading)-this should be made clearer as should the fact that whilst alleviating traffic through the village centre will undoubtedly help with improving its environment and enhancing its vitality etc; the Bypass alone will not achieve this.	
Blagdon PC	Blagdon Parish Council	We support the vision but remain sceptical about the ability to deliver it in a timely and economic fashion. We have yet to see any detailed proposals regarding timescales or phasing. We are concerned about the level and duration of upheaval that will be created over the development period, particularly if road and transport infrastructure is not prioritised over housing and business development.	
Bloor Homes South West		We agree with, and welcome the proposed vision for Banwell. We are reassured that synergy between the Council's, and Bloor Homes' aspiration for the Banwell Garden Village is evident and reflective of discussions undertaken on the site to date.	
British Horse Society	British Horse Society	The BHS agrees that a new M5 junction would probably be key to the success of a community here. Many of the incomers will work in Bristol or Taunton as well as Weston. The bridleway network in Banwell is very poor. The BHS therefore feels that it will be crucial here that any new walking or cycle paths are formally dedicated as multi-user using the definition above, making them as inclusive as possible and giving best value for public money. The new paths also need to be sensibly linked through to the Locking, Hutton and Sandford areas, thus giving safety for all groups of vulnerable road users, as well as allowing people from the more urban areas to safely access this beautiful countryside. A new path from Banwell to Sandford would connect Weston Super Mare paths to the Strawberry Line and paths on to Bristol. It would also enable Banwell school children to cycle to Churchill, thus promoting healthy lifestyles at an early age. A multi-user path would keep non motor traffic off the dangerous A368 between Banwell and Sandford.	
Christopher Day		The sections on Banwell and Banwell Garden Village contain a high degree of wishful thinking, in particular with regard to transport infrastructure and employment. Question 12, demonstrates that North Somerset Council has no concrete proposals to offer on employment. I do NOT support these proposals.	
Congresbury Parish Council	Congresbury Parish Council	The relief road being proposed by Banwell is something that the residents have wanted for a long time. However, the addition of a new 'garden village', the destruction of currently green and open space without assessment of other potential land (i.e. at Ashton Vale) is very poor. Congresbury Parish Council cannot support this vision on the current basis given the lack of strategic planning. There is great uncertainty about employment bases and transport issues which will impact Congresbury from the two proposed garden villages.	

Respondent Name	Respondent Organisation	Comment	Attached documents
CPRE Avonside	CPRE Avonside, North Somerset District	<p>Major housing schemes have so far been contained to the west of the M5 which has to some extent limited the impact on the ‘rural’ aspect of North Somerset and the Mendip Hills AONB.</p> <p>If the proposed ‘Banwell Garden Village’ was to go ahead, it should be separate from Banwell. Any new development should not impact on the character or encroach on the village of Banwell and should be designed to utilise the current road network and promote rail and public transport for commuting. Should there ever be a bypass for Banwell, evidence suggests that new roads will only increase traffic.</p> <p>Careful consideration should be given to housing and landscape design although we cannot see how industrial/distribution opportunities would ‘blend sensitively within the landscape to the north of the Mendip Hills AONB’.</p> <p>Floodplain and ecological issues need to be given priority and much of this will not be able to be mitigated.</p> <p>Industrial/distribution units do not bring a substantial number of jobs. Employment uses should be focused on smaller local businesses recycling profits back into the community and reducing travel.</p>	
Cresten		<p>The short Banwell bypass and traffic from the Banwell SDL would bring increased congestion and pollution to local roads outside Banwell including the A368 through Sandford., Traffic measures and extensive tree planting, to mitigate these effects, and the effect on the Bats SAC and wildlife corridors, are needed at the outset.</p>	
Ed Northcott	Mr	<p>In your “Critical issues raised through the consultation” section, you say that there is “some local support for the delivery of the Banwell Bypass but still concerns about the local traffic implications associated with, for example, a new M5 J21a and increased airport traffic.” You fail to mention the deep concern in neighbouring villages with the concept of a Banwell-only bypass, namely that if the bypass is only for the village of Banwell, then all the council will “succeed” in doing is to pass the traffic problems onto the surrounding villages. Sandford and Churchill especially will not be able to cope and will get clogged in a similar way to which Banwell does at present.</p> <p>The answer is to stop talking about a Banwell Bypass and a Sandford/Churchill Bypass, as if the two are separate and could exist independently. Rather, you cannot logically have a Banwell Bypass without also bypassing Sandford and Churchill, therefore you should really start talking about a Banwell/Sandford/Churchill Bypass – treating it as a single entity rather than two separate bypasses.</p>	
Elb1		<p>I have concerns regarding the site of the proposed 2nd motorway junction on the A371. No consideration appears to given to the existing homes in the area with an increase In traffic from Hutton to use the junction. The increased noise and the overall detriment of the current rural area to a urban junction which over time will be developed with fast food and services to support a motorway junction.</p> <p>How will a bypass with and new junction improve Banwell’s traffic situation. Surely this will just increase the volume of traffic from this area to access the junction thereby making the problem worse</p> <p>Surely Improvements to the existing junctions and public transport needs to be made for example additional slip road for the Burnham junction better/improved public transport from Weston to Bristol with access from the Banwell and Elborough locations more accessible.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The areas between Hutton and Banwell do not appear to be considered in any of the proposals and the impacts of a new junction in this area would be detrimental to these areas and the people who live there but also would result in increased traffic in areas where the proposal is to reduce/bypass this. It seems counter intuitive to build a bypass and then add a new junction to the area you are looking to bypass</p> <p>Has any consideration been given to a new dual carriageway or A road into Weston to service into Bristol and also to Taunton which could link up to the Motorways at points that are less residential and have the space to provide the services a junction requires.</p>	
GVA Grimley	GVA Grimley	<p>The principles will need to address the phasing of delivery in relation to the Weston Villages development to ensure that the development does not undermine the delivery of the existing key regeneration sites. One such concern would be flooding the residential market and placing an undue burden on existing and proposed infrastructure.</p>	
Hayes Family and Mr Cope		<p>We support the proposals for Banwell Garden Village and would direct the Council to our separate representations on this matter.</p>	
J White/Dodd		<p>Object to proposed new villages, for the following reasons:</p> <p>Proposals would put an intolerable strain on existing infrastructure, particularly roads, in the surrounding villages. Although there are some proposals to improve infrastructure, experience tells us that this invariably lags behind housing development, often by some years, and it is often shelved completely.</p> <p>The only housing which is needed in the area, is affordable housing, to allow young people to stay and breathe new life into the village. We do not, emphatically need 3 and 4 bed 'executive dwellings for professional people who inevitably commute to Bristol, thereby putting further strain on the roads.</p>	
L Zuccolo		<p>The fact that you (NSC) are spending a lot of money on this local plan before the JSP has even been considered this matter is DEEPLY troubling. Is it that you don't care what anyone thinks? Is there an agenda we should know about? Is it that you are that arrogant that you think it's a done deal regardless? It's very hard to trust an organisation where skulduggery seems to be so open.</p> <p>It's so unfair that NSC are putting residents under unnecessary stress before the JSP. It's not healthy to have this issue hanging over us.</p> <p>For Backwell. A massive road, destruction of wildlife, noise, light pollution, a multistory carpark. Really?! Come come now, is that right that people who have been living in a peaceful village now have to live in a transport hub?! To think people will sit back and give you a big thumbs up whilst you violate them is frankly laughable.</p> <p>It would seem that Backwell would be paying an extremely high price. Taking on a lot of heavy lifting in terms of traffic and building. It basically means that we won't exist anymore. It's TOTALLY disproportionate. Below is a very short list of the issues.</p> <ul style="list-style-type: none"> • 700 Houses on Grove Farm doubling our population • Car Park Expansion at Nailsea & Backwell Train Station • Park & Ride for Trains and Metrobus • Backwell becoming a "Transport Hub" serving a much wider area • A Link Road and Metro Bus (lite) Road linking the Nailsea SW development to Backwell and eventually going on to the M5 at Clevedon • Road running next to Backwell Lake and out onto Station Road. Bringing traffic in from the Motorway and surrounding areas • A New access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell. • New access roads at Rodney Road and Moor Lane on to Grove Farm • New roads linking Nailsea. (depending on where Nailsea's 3,200 new houses are allocated). • Noise • Light pollution • Stress and extinction of some of our local wildlife including bats, Kingfishers, Otters etc 	

Respondent Name	Respondent Organisation	Comment	Attached documents
Mark Funnell, Planning Adviser, National Trust	National Trust	<p>The National Trust owns the land of Dolebury Warren SSSI and scheduled monument in the Mendip Hills (a site which is managed by Avon Wildlife Trust).</p> <p>In our comments on the Joint Spatial Plan publication document in January 2018, we stated our concerns that “the scale of new housing and associated road infrastructure in this location [Banwell and Churchill] would adversely affect the views and setting of the Mendip Hills AONB”. We therefore agree that one of the critical issues is the impact on the Mendip Hills AONB, particularly in relation to the scale of development being proposed. As well as landscape and visual impacts, any potential ecological impacts should also be taken into account.</p>	
Mendip Hills AONB unit	Mendip Hills AONB Partnership	<p>The Banwell and Churchill SDLs (strategic allocations) are still to be tested through the Joint Spatial Plan examination. As set out in our comments dated 8 January 2018 to the Joint Spatial Plan consultation, we have strong concerns regarding the proposed allocation of Banwell and Churchill garden villages</p>	
Mendip Hills AONB unit	Mendip Hills AONB Partnership	<p><i>Regarding Pages 35 and 36: Banwell Garden Village Design Principles. Q11. Do you agree with the principles set out for Banwell Garden Village and would you suggest any changes to these? We consider that establishing the principles is a fundamental step towards developing the detail for development in these areas:</i></p> <p><i>The SDLs (strategic allocations) are still to be tested through the Joint Spatial Plan examination. As set out in our comments dated 8 January 2018 to the Joint Spatial Plan consultation, we have strong concerns regarding the allocation of Banwell and Churchill garden villages.</i></p> <p>Under bullet point 1, it is unclear what is meant by ‘innovative approaches to placemaking including technological advances, and to maximise the quality and effectiveness of development’.</p> <p>Under bullet point 2, it is unclear what is meant by the ‘design and feel will be compact with its own character and sense of identity emphasising the rolling landscape’.</p> <p><i>These SDLs (strategic allocations) are still to be tested through the Joint Spatial Plan examination. As set out in our comments dated 8 January 2018 to the Joint Spatial Plan consultation, we have strong concerns regarding the allocation of Banwell and Churchill garden villages.</i></p> <p>Under bullet point 1, it is unclear what is meant by ‘innovative approaches to placemaking including technological advances, and to maximise the quality and effectiveness of development’.</p> <p>Under bullet point 2, it is unclear what is meant by the ‘design and feel will be compact with its own character and sense of identity emphasising the rolling landscape’.</p> <p>With reference to bullet point 5, opportunities to link in to the wider green infrastructure network will be important. Under this bullet point, it is unclear what is meant by ‘ambitious design’.</p> <p>With reference to bullet point 13, it will be key that strategic road infrastructure is delivered prior to delivery of residential development. How will development be managed to ensure that phasing supports a holistic and coordinated approach to the wider outline development and infrastructure delivery, ensuring that piecemeal development does not take place?</p> <p>With reference to bullet point 14, green infrastructure with integrated SuDS and landscaping must respect the surrounding landscape character and drainage patterns within the setting of the Mendip Hills AONB.</p> <p>With reference to bullet point 15, not only should the development layout, form and design respect the setting of the Mendip Hills AONB, but any design principle documents and relevant master plans should include considerations of the protected landscape and the special qualities of the AONB. Views from and towards the Mendip Hills AONB should be protected particularly when considering the appropriate scale of the development, layout, design (including lighting) and landscaping. The impact of</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>development on the protected landscape and the special qualities of the Mendip Hills AONB would need to be carefully considered and supported by appropriate and acceptable mitigation measures.</p> <p>The proposed development will also increase the impact on the Mendip Hills AONB particularly as relates to pressures for recreation arising from the proposed new developments and on transport infrastructure. Not only will the impact of the proposed development on the protected landscape need to be considered with regard to layout, form, design and landscaping, but also the wider pressures from the proposed development and appropriate and acceptable mitigation measures would be required.</p>	
N Cooper	Claverham Future	The wrong location for so many reasons. It is believed that this is supported by NSC only because moving proposals to the Bristol border would likely benefit Bristol employers. That is so short sighted, the Bristol employers will benefit but NSC will have to arrange, or rather suffer the lack of, expensive infrastructure to feed to the London and Bristol Employment Market.	
Nailsea		<p>There does not appear to be any facility to comment on the transport studies so I attach my comments on this poor document here.</p> <p>This is one of the most important sections of the local plan and should have had its own question.</p> <p>Attached is my objections and comments</p>	Nailsea and Backwell Transport schemes.doc (28 KB)
P & M Matthews		<p>You are assuming that the developments on a huge scale will go ahead in the Chuchill/Banwell area and all of your questions take this as the base.</p> <p>I strongly disagree with this assumption and think it is absolute madness to add over 5,000 houses to a location 18 miles from where the bulk of the residents will have their jobs. The provision of a road to get some of them more speedily to the A38 south of the airport will only scratch the surface of the infrastructure needed to get them (and the current commuters) to work in Bristol. I travel in regularly for 9.00 am meetings and already have to leave at 7.30 am to get there on time. The new section of ring road is already log-jammed from the A370 back up to the roundabout on the A38 at that time. Add another 5,000 cars, at least, to this and there will be chaos.</p> <p>You have not listened, and the clear answer is to have the additional housing much closer to Bristol where public transport and other route options exist. This may mean taking some of the green belt away, but this could be offset by extending green belt designation in other parts of North Somerset - especially close to the Mendip Area of Outstanding Natural Beauty.</p> <p>I am hopeful that the JSP examination will address this point and reject your overall conclusions. You are wrong.</p>	
Roger Key		<p>1. Strategic Development Locations</p> <ol style="list-style-type: none"> The I&OD includes four areas for development that are described as Strategic Development Locations (SDLs). Given the forecast population growth in the WoE and in North Somerset, I am not against the proposals for some large development sites, as they can deliver the required infrastructure in terms of local amenities. However, I do object to the proposed sites at Nailsea and Churchill/Mendip Spring. Of the SDLs included in the I&OD, I can see that Banwell and Backwell may have their merits. Banwell is close enough to Weston-super-Mare for new residents to travel to work in Weston by cycling or new public transport services. Meanwhile, Banwell village has long needed a bypass and construction of 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>new houses will contribute to the cost of its construction. (I am not convinced that the additional houses should be located north of the proposed bypass but that matter is for a later stage of plan making. Backwell is well served for non-car travel by train and by regular bus services along the A370. So I can see the case for modest growth of Backwell too.</p> <p>3. In contrast, I am completely opposed to the proposed SDL of 2675 dwellings with employment land at Churchill/Mendip Spring because the site is simply too isolated and too far from the employment centres of both Bristol and Weston-super-Mare. There is little prospect of providing a frequent bus service to attract travellers away from their cars to these destinations. So residents working in those locations will be forced to travel by car adding to traffic on the routes to the west and north, including both the A370 and the A38. The A38 to the north of Bristol Airport already needs improvement (even before the airport applies to expand its passenger limits). The A370, with several villages straddling the road between Congresbury and Flax Bourton, is not capable of carrying significant growth in traffic without harming those settlements through declining air quality, noise, vibration, severance and an increased risk of accidents.</p> <p>4. I also have concerns about the allocation of an SDL for 2575 dwellings with employment land, within the Plan period, located to the south-west of Nailsea. Here, I can see that there may be scope for some development but the location appears to me to be on the “wrong side” of Nailsea, as it’s too remote from the town centre. It seems to me that it would be better to concentrate development at Nailsea on the north and north-east side, where it would be closer to and easier to integrate with the existing town. Extensive development to the south-west would also concentrate development traffic on the A370. Even with the suggested transport mitigation package, the JSP Transport Topic Paper (Update) WED007 predicts increases of traffic of several hundred vehicles in the AM peak, which is probably beyond the capacity of the existing road. Allocating land to the north and north-east would channel additional traffic onto the B3130, where it would impact on far fewer residents.</p>	
SCT1967		<p>I am completely opposed to the strategic locations for housing on this scale in Churchill, Banwell and Backwell. There are no significant new employment opportunities in these areas so as a consequence additional housing will hugely increase the number of commuters travelling from North Somerset to Bristol, and there is no plan to upgrade existing transport infrastructure to carry this commuter traffic from North Somerset to Bristol. Current road travel times into Bristol at rush hour are up to 90 mins from Churchill to Bristol along the A38, and similar from Congresbury to Bristol along the A370. Train infrastructure is already at breaking point with insufficient provision for the number of commuter travellers, as well as there already being insufficient parking at the two main railway stations at Yatton and Nailsea/Backwell to accommodate commuters from outlying villages. North Somerset Council should be building on Ashton Vale and areas closer to Bristol which could be served with existing infrastructure.</p>	
The Haynes Family		<p>3.1 As part of the Issues and Options consultation exercise, specific questions are asked, and we respond to those of relevance below.</p> <p>3.2 It is recognised that a range of infrastructure will be needed to unlock the wider development of the Banwell Garden Village site and to create a sustainable, self-contained community. This will include social infrastructure (such as shops, a school, meeting place etc.), transport improvements, sustainable drainage (in the form of attenuation ponds and other similar measures), green infrastructure, recreation areas and noise bunds.</p> <p>3.3 The initial concept diagrams included within the Issues and Options consultation document, take forward developing the vision, principles and refine the form and potential location of the proposed development as identified within the JSP. We acknowledge that these are indicative at this stage and we welcome the opportunity to provide our views and feedback. To assist in consideration of the site allocation, we have prepared a masterplan, included at Appendix A which shows an overall land budget for the Garden Village of:</p> <ul style="list-style-type: none"> • Residential – 60.8 ha • Employment – 10.4 ha • Local Centre – 3.2 ha • Primary School – 2.2 ha • Green Infrastructure – 51.8 ha • Park and Ride – 3.3 ha 	<p>The Haynes Family - site submission.pdf (4.6 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>3.4 This master plan has been based on technical assessments and advice and responds to the constraints and opportunities that apply to the land. These are summarised in plan form in the constraints and opportunities plan that is set out at appendix B of this document.</p> <p>Q10. Do you have any comments on the proposed vision for Banwell?</p> <p>3.5 We support the general suggested location for the Garden Village, to the north west of Banwell and the vision for a separate settlement, which has its own character and sense of place. We agree that the site is well positioned to achieve a sustainable new community which meets housing and employment land need within North Somerset, but also the wider area. We support the proposed vision and consider that it meets the three overarching objectives (economic, social and environmental) of sustainable development as outlined within the NPPF (para 8).</p> <p>3.6 Maintaining easily accessible links between the proposed Garden village and existing facilities will be key in order to ensure connectivity with existing settlements and this will help to support strong, vibrant and healthy communities.</p> <p>3.7 We also agree that enough distance should be maintained to provide separation between the new Garden Village and Banwell, but also that sufficient separation should be given to the hamlets of Wolvershill (to the north) and Stonebridge (to the south) to ensure these settlements do not merge. To achieve this, we suggest that development more akin to that presented in the masterplan included at appendix A of these representations be pursued.</p> <p>3.8 We support the proposals for a new bypass and a potential new junction to the M5, but as you will see in respect of our separate representations relating to the nearby "Locking" site, we consider this junction would be better located slightly to the south of the existing alignment of the A371. This will make it easier to provide the Park and Ride envisioned for the area, improve access and connections between rural communities and support economic growth by allowing the employment area envisioned as part of the Garden Village to be more easily accommodated adjacent to this junction. Again, this approach accords with the thrust of the NPPF.</p>	
WENP	West of England Nature Partnership	We suggest the vision better incorporates high quality green infrastructure at all scales. For example, including opportunities for people to enjoy living natural spaces – both in the public realm but also weaving through individual developments (ref Building with Nature benchmark).	
Winscombe and Sandford Parish Council	Winscombe and Sandford Parish Council	<p>Good access to the M5 would not be possible without the addition of a new two-way junction 21a of the M5, and this must be progressed as a priority along with the Banwell bypass. Works on infrastructure should be completed before creation of the Banwell Garden Village.</p> <p>As congestion problems currently experienced in Banwell would be transferred largely onto the A368 through Sandford, until the second phase of the bypass is implemented traffic management plans for Sandford should be agreed as part of the Banwell bypass proposals. The A368 through Sandford, and especially in the vicinity of the primary school should be added as an 'air quality monitoring area.</p>	
Wrighton Parish Council	Wrighton Parish Council	To annex the proposed 'garden village' to Banwell would alter beyond recognition the character of this historic village which has scant resources to sustain a new development of the size planned (1900 dwellings plus 5 ha. of 'employment land'). The provision of a further motorway junction would also impact significantly on traffic volumes through the village (or via the proposed 'link road') with commensurate adverse impact on the bats' foraging areas which are protected through NSC's SPD.	
Wrighton Village Alliance		<ol style="list-style-type: none"> 1. - employment - employment will only take off in Banwell provided there will be north facing slips on the new M5 interchange. Highways England should be challenged to agree a Departure from Standards if necessary to permit north facing slips. 2. alternatives - these are not real alternatives and have little in terms of pros and cons. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
wwarden		I will leave it to the residents of Banwell to comment, although I appreciate the value of the long awaited by-pass. However, my feeling is that the proposed development is excessive.	

Document Part Name	Comment
	Q11. Do you agree with the principles set out for Banwell Garden Village and would you suggest any changes to these? We consider that establishing the principles is a fundamental step towards developing the detail for development in these areas.

Respondent Name	Respondent Organisation	Comment	Attached documents
Avon Wildlife Trust	Avon Wildlife Trust	<p>Whilst we strongly support the principle of addressing ecological issues both through on-site measures as well as through a more strategic solution which considers wider ecological networks and the landscape scale, we also think that not all ecological issues can be dealt with in this manner. If significant negative ecological effects are associated with the creation of Banwell Garden Village and its' associated infrastructure then we suggest that the quantum of development in this location should be capped at a level where this can be avoided.</p> <p>The transport schemes required to support the development in Banwell Garden Village is primarily based on building new roads in very ecologically sensitive areas. The land take required for these new road has to potential to destroy ecological rich habitat in the North Somerset Levels and Moors which provides 3% of the remaining wetland habitat in the UK. These new roads also have the potential to cause significant severance of greater and lesser horseshoe bat commuting routes. These routes are particularly sensitive in this location as they provide links between winter hibernation sites and summer maternity roosts.</p> <p>All development proposed in the local plan must be compliant with North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document.</p> <p>Many of the waterbodies in North Somerset are failing to achieve the environmental targets set for them in the Water Framework Directive. It is vital that any new development does not have an adverse impact on the surrounding waterbodies WFD status.</p>	
Banwell Parish Council	Banwell Parish Council	We are pleased to see that many of our original ideas submitted at the first consultation have been included in this document and therefore we broadly agree with the principles. We would wish to see that any sport or recreational facilities in the green gap between the Garden Village and Banwell respect the principle and are not large or more than single storey and that high-quality green infrastructure should permeate through the new village and not be restricted only to its surrounds.	
Blagdon PC	Blagdon Parish Council	We support the principles but remain concerned about the authority's ability to deliver these.	
Bloor Homes South West		<p>The principles set out for Banwell Garden Village are broadly agreed, although it is not clear at this stage how these principles will form the basis of or inform specific future Local Plan policy.</p> <p>The accompanying Turley Vision Document expands on, and develops, these principles and demonstrates an indicative masterplan for the site which integrates the draft principles, but is also deliverable and realistic; Bloor welcome the opportunity to remain involved in close working with the Council as part of developing the detailed policy framework required for the Garden Village proposals.</p> <p>Notwithstanding the above, we would like to comment on the following principles:</p> <ul style="list-style-type: none"> • The village will be physically separated from the motorway and Banwell with its own local centre and primary schools – the Turley indicative masterplan demonstrates how the Garden Village could accommodate a physical separation between itself and Banwell while delivering development in some form to the south of the proposed Banwell Bypass, in the interests of good placemaking principles. It is 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>proposed that this area could include uses to reflect a gateway into the village and/or include a first phase of residential development.</p> <ul style="list-style-type: none"> • A local centre will be required as a focal point and consideration will need to be given to how existing provision in Banwell can be enhanced and shared between the two settlements – the Turley indicative masterplan shows how a local centre can be accommodated at the heart of the proposed village, but also how there is scope to include community uses can be accommodated at the gateway of the site to be shared between the two settlements. • Development will largely occupy the south facing slopes of Woolvers Hill, maximising solar gain within the development – this principle is considered to be too vague, as if taken prescriptively could limit the extent of development and result in a significant reduction to the net developable area of the site, to the detriment of the overall place making and sustainable development objectives for the scheme. We consider that maximising development on south facing slopes can and may play a role in developing a masterplan for the site, but should not be at the expense of achieving other key masterplanning principles. Alternative wording as follows would be suggested “Opportunities for residential development to maximise solar gain on the south facing slopes of Woolvers Hill will be encouraged”. • New residents will be encouraged to lead community engagement to help shape a vibrant sociable neighbourhood – this principle should be welcomed, and forms an important part of shaping a new community, however for the sake of brevity in plan making and effective policy drafting, it isn’t appropriate to include at this stage (as a possible policy requirement) and should be removed. <p>We consider a further principle should be added:</p> <ul style="list-style-type: none"> • Producing a masterplan for the site which maximises effective and efficient use of the available developable land, assisting in the viability of the scheme, helping to justify key infrastructure funding, and ensuring there is a critical mass of housing to secure the vitality of a village in the long term. 	
Congresbury Parish Council	Congresbury Parish Council	<p>Overall the principles seem sound apart from the issues related to the flood plain and how so much development would affect the area. This could cause increased risk of flooding across the moors and may increase the risk at Congresbury. We expect an assessment to be made as soon as possible to show the impacts.</p>	
Environment Agency	Environment Agency	<p>M5 to A38 Transport Corridor (Up to 5,400 dwellings), these need to be located on higher ground out of the fluvial floodplain. The low lying land around Way Wick and the Rolstone area has drainage issues as well as fluvial floodplain. Proposed developments would need to provide reduced runoff rates and long term storage.</p> <p>The Banwell and Churchill areas are located in Flood Zone 1 but have potential to add an increased rate and increased volume of surface water into the main rivers and floodplains. Additional surface water draining to main-river will mean drainage networks will further struggle to drain into main-river and therefore fields will remain wetter for longer. Proposed developments would need to provide reduced runoff rates and long term storage to prevent volume increase. Alternatively/additional strategic flood solutions, as utilised on the River Banwell downstream of the M5, could be implemented downstream of the garden village locations.</p> <p>Pumping stations may also be required to pump water from low lying areas into main rivers and the main IDB watercourses, where gradients are shallow, or from areas which are also suffering from drainage issues.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Hallam Land Management Ltd (David Lock Assoc)		HLM are strongly opposed to the principle of strategic scale development at Banwell and Churchill. An interrogation of the available land parcels in the SHLAA reveals a lack of comprehensive land holdings when compared to the comprehensive development areas proposed by the concept diagrams. Additionally, the WoeJSP states that development here cannot come forward until the construction of the Banwell Bypass, a route which as yet is not confirmed, costed nor programmed. This significant infrastructure required to unlock any development of scale at Banwell and Churchill could undermine the delivery of new garden communities within the plan period. The land is also proximate to the Mendip Hills AONB, to which HLM consider has not been afforded sufficient weight, as set out in our response to Q7. Delivering effective landscape mitigation at such close proximity to the AONB could reduce development potential and undermine the delivery and viability of the schemes. Alternatively, the Land East of Clevedon is well placed to deliver growth at scale that is aligned with strategic yet less strenuous infrastructure improvements serving other strategic development locations at Nailsea and Backwell, would be in line with the settlement hierarchy, and would negatively impact upon the AONB. In addition, the land is controlled and being promoted as a whole by HLM and is therefore deliverable, unlike the complex land ownership structures at Banwell and Churchill.	
Hayes Family and Mr Cope		We agree with the majority of the principles set out for the Banwell Garden Village proposals but our specific concerns are set out in separate representations in relation to these objectives.	
N Cooper	Claverham Future	So wrong, it cannot be made right.	
Newland Homes		<p>5.1.2 It is noted the need to phase development in relation to the delivery of the Banwell Bypass and other local road improvements. It will be important to ensure the delivery of other smaller sites in the short term which will not be as reliant on upfront infrastructure.</p> <p>5.1.3 The proposed garden village lies within an area assessed as having ‘high landscape sensitivity’ in the Landscape Sensitivity Assessment 2018 (i.e. if developed for housing could result in substantial harm) therefore it is considered the 1,900 dwellings proposed is optimistic.</p>	
The Haynes Family		<p>On behalf of the Hayes Family, Grass Roots Planning has been instructed to prepare and submit representations to the North Somerset Local Plan 2036 “Issues and Options Document” Consultation, in respect of land to the north-west of Banwell in North Somerset, which runs from 3 September until 10 December 2018.</p> <p>1.2 This consultation exercise follows the previous “generating ideas” consultation in November 2017, to which we also submitted representations.</p> <p>1.3 This document sets out our formal representations to the Issues and Options document, specifically in respect of promoting land to the north west of Banwell for allocation as part of the Banwell Garden Village Strategic Development Location, as identified within the emerging West of England Joint Spatial Strategy (JSP)</p> <p>The Hayes family own part of the land currently earmarked for development as part of this proposal (‘The Hayes Land’), as show in Figure 2 in section 2 of the attached document.</p> <p>1.5 Within the emerging JSP, the latest version, the Publication Document (November 2017) identifies land at Banwell as strategic development location (SDL), in the form of a Garden Village. The JSP currently identifies, inter alia, that the SDL at Banwell will provide the following:</p> <p>A new garden village of about 1,900 homes to the north of Banwell, with its own character and sense of identity, sensitively designed in relation to the existing context;</p> <ul style="list-style-type: none"> • A new local centre to complement existing facilities within Banwell; • Development will not commence until the construction of the Banwell Bypass as part of the M5 to A38 highway improvements with connection to a new M5 junction 21a. Development must not prejudice the delivery of future improvements to the M5, including the construction of a new M5 junction ; • Identification of around 5ha of employment land, primarily Use Class B8, which has good access to the M5 and new strategic transport infrastructure; 	The Haynes Family - site submission.pdf (4.6 MB)

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • Bus service improvements to Weston-super-Mare and Bristol, including potential for Metrobus cycle as well as new footpaths and cycleways connecting the garden village to Banwell, Weston-super-Mare and nearby villages; • Up to 2 new primary schools and a secondary school; • Development which avoids the floodplain and reduces run-off rates, through the use of attenuation ponds and other features; • Provision of multi-functional and interconnected green infrastructure; and • Protection and enhancement of the greater and lesser horseshoe bat habitat. <p>1.6 We strongly support the strategic development location proposed at Banwell within the emerging JSP and suggest that the land identified in Figures 2 and 3 should be included within the allocation as part of this Garden Village proposal in the emerging Local Plan.</p> <p>1.7 These representations have regard to para 35 of the NPPF, that requires for a draft Plan to be “sound” it is necessary for it to be:</p> <ul style="list-style-type: none"> • Positively prepared • Justified • Effective • Consistent with national policy <p>1.8 The following comments are made on the basis of ensuring that the tests of soundness are met, namely that the Plan is positively prepared and consistent with national policy.</p> <p>2.0 LAND NORTH-WEST OF BANWELL</p> <p>2.1 The Hayes land lies to the east and west of Summer Lane, north-west of the settlement of Banwell. It comprises a range of fields which are divided by hedgerows. It is mainly low lying with some higher land contained within the northern part of the site, adjacent to the M5.</p> <p>Under the current Core Strategy planning maps, the site lies outside of any established settlement boundary as figure 3 illustrates</p> <p>2.4 This shows that the land is unconstrained in terms of any specific protective designations, such as an AONB, Flood Zone, Conservation Area, Green Belt, SNCI, or SAC. The site is also unconstrained in terms of TPO trees, listed buildings in close proximity or Public Rights of Ways (PROWs) crossing the land.</p> <p>2.5 There are some minor surface water flooding issues across the land, which can be seen below in figure 3, but following suitable technical work undertaken we are confident that surface water could be discharged from the site at existing flow rates and via established flowpath routes which run across the site and any existing issues could be alleviated through the provision of an appropriate surface water strategy as part of any development if this land and the wider Banwell GV.</p> <p>2.6 One other minor constraint that needs to be considered is the proximity of the M5 and the associated issues with noise or amenity. However, having recently undertaken noise assessments in respect to a nearby planning application (ref: 18/P/3038/OUT) on land to the west of the M5 (as shown on site location plan, shown at Figure 5 below), in relation to which we have made separate representations, it is clear that proposals which include appropriate mitigation such as a noise bund and acoustic fencing, then homes can be built in close proximity to the M5 with no adverse effects. This has been found to be acceptable approach in relation to the Mead Realisations application which provided similar mitigation on the eastern side of the M5, just to the north of the land subject to planning permission ref 16/P/2744/OT2 (this is the orange land shown on figure 5). We also consider that the land in closest proximity to the M5 could be used for recreational purposes and/or for surface water attenuation or other mitigation measures (such as noise bunds/buffer) as part of the wider garden village proposals.</p> <p>As such, there are limited constraints in relation to the land in this location and therefore we consider that it can make a significant contribution to housing and employment land delivery and act as part of the comprehensive strategic development at Banwell Garden Village.</p> <p>Response specifically to question 11:</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>3.9 We support the general direction of the emerging principles; however, it is important that the emerging Plan recognises the lead-in times and associated infrastructure requirements of a new settlement of the scale proposed.</p> <p>3.10 We therefore comment below on a number of principles identified. While we have addressed these comments in relation to the specific principles set out in the consultation document, many of these comments apply across a number of different issues, but in the interests of brevity, we have not repeated the points as we presume the general thrust of our comments will be considered in the round.</p> <p><i>The village will be physically separated from the motorway</i></p> <p>3.11 While the separation of housing from the motorway is supported, it is considered that part of the land between Summer Lane and the motorway should be formally included within the future Garden Village site allocation. We consider that this area should be allocated as employment land, possibly some housing, as well as associated and ancillary infrastructure required to support and facilitate the wider Garden Village.</p> <p>3.12 If this land is not included, it is our view that this will create an isolated strip of farmland with little productive value, which would also be hard to farm in operational terms. Including the land within the allocation for additional development and supporting infrastructure, not only makes the most efficient use of the land, but will also ensure that more usable farmland to the east and north can be retained in agricultural use.</p> <p>3.13 While we support the general area identified for employment land, we do not consider that the quantum proposed is aspirational enough, particularly if the new motorway junction is delivered to provide easier access to the sub-region. Therefore, we consider additional land should be allocated for employment use which would extend further north as shown in our proposed master plan set out at appendix A. This area is best placed for employment land, given its proximity to the existing road network but also new infrastructure proposed. It would also act as a visual buffer between the motorway and the new Garden Village.</p> <p>3.14 In addition to employment land, this area of land is also well placed to provide the required ancillary infrastructure which will be an integral part, essential to ensuring the successful delivery of the Garden Village. This could include noise bunds or alternative acoustic mitigation to ensure the Garden Village is protected from motorway noise, and attenuation ponds as part of a sustainable drainage strategy as well as providing a visual buffer. Both such features could be linked into the use of this area as a recreational area of open space and green infrastructure around the Garden Village.</p> <p>3.15 To ensure the Garden Village vision can be fully realised, it is essential that sufficient provision is made within the allocation from the outset for such supporting infrastructure and to meet future growth and demand for employment space in the event that unanticipated economic growth occurs, above existing projections, within the Plan period.</p> <p><i>Outdoor recreation space will be engrained in the masterplan to embrace healthier lifestyles</i></p> <p>3.16 We support this principle and consider there is the opportunity to create a recreation area around the proposed Garden Village, as shown on the suggested Masterplan we have prepared (appendix A). There is the scope to link such an area into ancillary infrastructure required to support the wider development, such as attenuation ponds and noise bunds, which could be recreation and/or landscape features in their own right. We consider that such areas must be formally included within the site allocation, to ensure that sufficient provision is made for such infrastructure and to maximise the developable areas to ensure the most efficient use of space. This approach would accord with the NPPF's sustainable development objectives and the NPPF's recognition of the importance of access to a network of high-quality open spaces and opportunities for sport and recreation to the health and well-being of communities (para 96)</p> <p><i>The delivery of the garden village in accordance with garden village principles, with high quality green infrastructure surrounding the village</i></p> <p>3.17 The Garden Village approach is supported. In our view land surrounding the village should be included within the site allocation, to ensure that there is appropriate land for associated and supporting infrastructure, as well as to meet future growth. This will also ensure the provision of a high-quality green infrastructure between the M5 and the proposed village.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>3.18 We support the delivery of this strategic development in accordance with Garden Village principles and the creation of a self-contained new community.</p> <p><u>Land will be allocated for employment uses taking advantage of the proposed new motorway junction</u></p> <p>3.19 We agree with the general area identified as employment land, as it is well located with good access routes, close to existing routes to/from Western-super-Mare, the proposed new Banwell by-pass and a potential new motorway junction. However, as mentioned above, we do not consider that the quantum proposed is aspirational enough and this current Local Plan review provides the opportunity to positively and proactively plan for future sustainable economic growth.</p> <p>3.20 We consider that a larger area should be allocated for employment land in the location identified to ensure that the main central Garden Village area identified can be dedicated to the delivery of housing and associated facilities. This approach would accord with the emerging JSP, which identifies the delivery of 5ha of employment land with good access to the M5 and new strategic transport infrastructure. This approach is also supported by the NPPF, which requires planning policies to positively and proactively encourage sustainable economic growth (para 81).</p> <p><u>Management of surface water on site through attenuation measures and integral part of green infrastructure.</u></p> <p>3.21 The sustainable management of surface water will need to be an integral part of the Garden Village proposals and the site allocation needs to ensure sufficient land is identified for such measures to ensure that this strategic development can be delivered. This is considered above, and the masterplan we have prepared identifies how this could be achieved through the use of peripheral land which will then allow the efficient use of the main Garden Village allocation.</p> <p><u>Ecological Issues to be addressed and potential link to off-site mitigation</u></p> <p>3.22 A potential green infrastructure network is identified to provide a link to the wider network, including the Grumplepill Ryne corridor. While we support the general principles of these green infrastructure networks, we consider the width shown would unnecessarily constrain employment development to the south. In our view, this would be better placed to the north of Grumplepill, or reduced in width and incorporated within green infrastructure looping around the Garden Village to the north, so as not to constrain the development potential of the area to the south, which is identified for employment uses.</p> <p>Q12. We would be interested in your thoughts on additional employment at the Banwell development including the type and possible location</p> <p>3.23 We would strongly support the provision of high-quality employment land being allocated and specifically identified on land between the garden village and the motorway to the west of Summer Lane. We do however, consider that this area should extend north to maximise the use of this area, which is well placed in respect of existing transport infrastructure, such as the Banwell Bypass and new M5 junction.</p> <p>3.24 If the motorway junction is delivered, then the site would be an excellent location for distribution and other employment uses complementary to the motorway network. Such uses are “land hungry” and provide further reason why a more aspirational allocation of employment land should be pursued here. We consider the allocation should be more aspirational at this stage to make provision for future economic growth, as encouraged by the NPPF.</p> <p>3.25 Therefore, we propose that additional land is allocated for employment, to the north of that currently earmarked by the council. This is illustrated in our masterplan contained at appendix A to this document.</p> <p>3.26 This location would provide a separation between the garden village and the motorway and would ensure employment land is located with good transport links, close to the M5 junction and the junction with the proposed bypass.</p> <p><u>Management of surface water on site through attenuation measures and integral part of green infrastructure.</u></p> <p>3.21 The sustainable management of surface water will need to be an integral part of the Garden Village proposals and the site allocation needs to ensure sufficient land is identified for such measures to ensure that this strategic development can be delivered. This is considered above, and the masterplan we have prepared identifies how this could be achieved through the use of peripheral land which will then allow the efficient use of the main Garden Village allocation.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p><u><i>Ecological Issues to be addressed and potential link to off-site mitigation</i></u></p> <p>3.22 A potential green infrastructure network is identified to provide a link to the wider network, including the Grumplepill Ryne corridor. While we support the general principles of these green infrastructure networks, we consider the width shown would unnecessarily constrain employment development to the south. In our view, this would be better placed to the north of Grumplepill, or reduced in width and incorporated within green infrastructure looping around the Garden Village to the north, so as not to constrain the development potential of the area to the south, which is identified for employment uses.</p>	
Tom Leimdorfer		The design principles for this settlement look sound. It is vitally important that they should not be watered down by allowing 'viability issues' (large profit margins) of developers to reduce quality, proportion of affordable housing or ecological issues. Thought should be given to access from the smaller settlements at Hewish and Puxton as the new Banwell Village will be their nearest centre for a range of facilities.	
WENP	West of England Nature Partnership	<p>We suggest amending the principle relating to green infrastructure to incorporate different scales within the village as well as its surroundings, for example:</p> <p>The proposed development will be delivered in accordance with garden village principles, with a high quality of green infrastructure within and across developments, and surrounding the village, and ambitious design. We strongly support the principle of addressing ecological issues both through on-site measures as well as through a more strategic solution which considers wider ecological networks and the landscape scale. We support the trialling of strategic solutions such as Natural England's district licencing among others.</p>	
Winscombe and Sandford Parish Council	Winscombe and Sandford Parish Council	Plans for the creation of a new two-way junction 21a of the M5 should be progressed as a priority along with the construction of a by-pass. Both should be constructed before development begins.	
Wrington Parish Council	Wrington Parish Council	Agree and support the principles set out.	

Document Part Name Q12. We would be interested in your thoughts on additional employment at the Banwell development including the type and possible location.

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	Additional employment land needs to be co-located with any new housing. Live-Work units using fibre to the premises should be deployed as the only short term effective means of providing additional housing without adding to commuter congestion at peak hours.	
Avon Wildlife Trust	Avon Wildlife Trust	No comment	

Respondent Name	Respondent Organisation	Comment	Attached documents
Banwell Parish Council	Banwell Parish Council	We are concerned that a large Distribution Centre close to J21a could be intrusive to the ANOB and that it would not be conducive to a village setting. Equally we are not convinced that it would bring the range and scale of employment that local people need.	
Bloor Homes South West		We consider that any larger scale employment land/development would be best placed in close proximity to the anticipated new Junction 21A of the M5 as referenced in the vision for Banwell on page 35 of the Issues document. Other smaller scale and/or non 'B' Use Class employment opportunities can be integrated within the core area of the village as anticipated in the submitted Vision Document.	
Congresbury Parish Council	Congresbury Parish Council	We support the identification of land for employment but do not expect this to greatly decrease the commuter traffic generated by this village that will be heading towards Bristol and Weston. Again there are few details of transport proposals for surrounding area which will be affected by this very large development. What happens if these employment options are not taken up by businesses and the issues document does not present any details on how businesses will be attracted apart from talking about links to the M5. The proposed exit and entrance on the M5 would also need to be improved to really attract new employment.	
GVA Grimley	GVA Grimley	We note the potential inclusion of 5ha as identified in the JSP which may include distribution use. At this early stage given the challenging conditions to delivering employment land at nearby Locking Parklands St Modwen seeks reassurance that any allocations are properly tested. This will need to ensure that any allocations do not result in an oversupply of commercial land thereby reducing land values to the extent they are no longer viable to bring forward.	
Hayes Family and Mr Cope		5.20 We consider that additional employment land should be incorporated within the Banwell Garden Villages proposals to be aspirational and deliver high quality employment land in this area. Please see our representations relating to Banwell Garden Village on this matter. 5.21 A park & ride facility could then be incorporated on land closest to the A371 to improve public transport options into the centre of Weston-super-Mare.	
The Haynes Family		3.23 We would strongly support the provision of high-quality employment land being allocated and specifically identified on land between the garden village and the motorway to the west of Summer Lane. We do however, consider that this area should extend north to maximise the use of this area, which is well placed in respect of existing transport infrastructure, such as the Banwell Bypass and new M5 junction. 3.24 If the motorway junction is delivered, then the site would be an excellent location for distribution and other employment uses complementary to the motorway network. Such uses are "land hungry" and provide further reason why a more aspirational allocation of employment land should be pursued here. We consider the allocation should be more aspirational at this stage to make provision for future economic growth, as encouraged by the NPPF. 3.25 Therefore, we propose that additional land is allocated for employment, to the north of that currently earmarked by the council. This is illustrated in our masterplan contained at appendix A to this document.	The Haynes Family - site submission.pdf (4.6 MB)

Respondent Name	Respondent Organisation	Comment	Attached documents
		3.26 This location would provide a separation between the garden village and the motorway and would ensure employment land is located with good transport links, close to the M5 junction and the junction with the proposed bypass.	

Document Part Name Q13. Do you have any comments on the Concept Diagrams and Alternative Scenarios set out?

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	Detail is premature. The Garden Village concept has yet to be substantiated.	
Avon Wildlife Trust	Avon Wildlife Trust	No comment	
Banwell Parish Council	Banwell Parish Council	Given the support in the document for the 'green gap' between the Bypass and Banwell we would firmly support Alternative Scenario 1. with any future strategic development extending northwards from the proposed SDL. However, the report needs to make clearer whether the alternative scenarios are intended to be alternative locations for the identified SDL or alternative locations for its expansion. If the latter then this is too soon for inclusion in a plan to 2036, except for longer term reservation for future development (beyond 2036) or it is a tacit recognition that more than 1900 dwellings may need to be accommodated to 2036	
Blagdon PC	Blagdon Parish Council	Response to Q12 : Additional employment opportunities are to be welcomed but again, the infrastructure must be prioritised in order to avoid the perpetuation of the gridlock that frequently blights Banwell. Response to Q13: We have no specific comments.	
Bloor Homes South West		We propose that the concept diagram should be revised to take into account both the first alternative scenario proposed (including further development to the north up to and beyond Silver Moor Lane), and the second alternative scenario including development between the proposed Banwell Bypass and Banwell Village. There is scope for development at Banwell Garden Village which is in excess of the capacity identified by the emerging JSP currently; additional development will only help to ensure the vitality and viability of the settlement, and the benefits of the infrastructure funding being committed to the Banwell Bypass. The Turley masterplan included in the accompanying Vision Document has been informed by technical studies in relation to landscape, topography, flood risk and drainage, ecology, highways and with consideration to the principles set out in the Issues document. The forthcoming planning application on the site will demonstrate through detailed supporting information that the Turley masterplan (likely broadly in accordance with the current draft) is justified and evidenced. In essence, extending the concept diagram for Banwell Garden Village to include the two further land scenarios is entirely justified and would help to facilitate the delivery of homes, and important services and infrastructure, on the site in accordance with North Somerset Council's vision.	
Deleted User		I am writing to comment on your proposal to build a new town (not a village) north of Banwell and Langford. I base my comments upon the key planning considerations listed on page 11 of the council's Life publication, Issue 140.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>I am not against well thought through and democratic new development projects.</p> <p>Putting aside the fact that there is already outline planning permission granted for over 600,000 homes across the UK and the proposed development is not required at all...</p> <p>1 The need to protect landscapes and the natural environment.</p> <p>Your proposal will destroy huge swathes of sensitive, beautiful, productive land, while the proposed highways will bring increased pollution to existing communities, and in the case of Churchill will see the destruction of the village's recreation facilities ie cricket and football pitches, and the virtual destruction of the ancient common land at Havvatt Green.</p> <p>2 Communities close to services, facilities and jobs.</p> <p>Local services/facilities are in the main fully/over utilised and there are few new local jobs available, of these most are low skill, poorly paid and insecure. The Council has a very long record of failing to generate quality jobs in the area, and there is no reason for this to change. The established and vibrant existing communities of Churchill and Langford will be overwhelmed and destroyed. Any development needs to be closer to the economic powerhouse of the South West – Bristol.</p> <p>3 Opportunities to create more jobs and support local business.</p> <p>The Council has a very long record of failing to generate quality jobs in the area and this won't change. Indeed its policies have often actively worked against job generation. The Council's support for local businesses over the years has been weak, at best. There is no reason to believe that the council's performance will improve, indeed with such a huge proposed project it will probably be worse as it struggles to cope with the 'opportunities' it has created.</p> <p>4 Additional homes supporting local schools.</p> <p>Sorry, this is the wrong way round, local schools, many of which that are already oversubscribed, will be called upon to support the new homes. The quality of education serving the new town will inevitably fall. Existing and new schools will find quality teacher recruitment difficult due to current and future teacher shortages.</p> <p>5 Traffic on roads and getting around.</p> <p>Even central Government recognises that you cannot build yourself out of traffic congestion. Your proposal will simply push traffic and pollution into pristine countryside, at a huge environmental and sociological cost, for the sake of some small wins eg reducing congestion in Banwell/M5 WSM junction.</p> <p>6 Energy efficiency of new homes and opportunities for renewable energy.</p> <p>Since when did North Somerset Council influence the construction of quality energy efficient homes over the past 20-30 years? It is all developer led, or not led at all. The planning gains negotiated by the council have also been very meagre.</p> <p>7 High quality design and place making.</p> <p>Since when did North Somerset Council influence the high quality design of new homes? Never. Just look at the location and design of most of the new homes in WSM as an example. There is no reason why this will change for the proposed development. It is all developer led.</p> <p>I expect my comments to be fully considered and put forward to the planning inspectors. Please confirm that this will indeed be the case</p>	
Environment Agency	Environment Agency	<p>A new motorway junction and bypass is proposed at Banwell. The bypass would need to cross the River Banwell. There would need to be no loss of floodplain in this area.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Hayes Family and Mr Cope		<p>Comments specific to Banwell have been prepared and submitted as separate representations and therefore we would direct the Council towards these. With respect to Locking, we do not agree that the northern parcel should be sterilised as a 'green infrastructure' route. The land is not available to the public and therefore has no recreational value; and in terms of ecological value this is limited to the Grumblepill Rhyne itself which is noted for its biodiversity – the designation does not extend beyond this. We therefore consider the more extensive sterilisation put forward to be inappropriate and unjustified.</p> <p>We consider that development to the north up to and beyond Silver Moor Lane would be more appropriate than development between the Banwell bypass and Banwell Village. It is important to maintain an open gap between these two areas; in addition to this, if the bypass is going to be a busy A road (or even dual carriageway), any development to the south of this and between Banwell village would be severed and divorced from the new garden village.</p> <p>Links would be difficult to provide across the road and would result in poor urban design. Furthermore, development south of the bypass would lead to the coalescence of the new settlement with the village of Banwell itself.</p>	
Mr M Middle		<p>As part of this representation, the land as outlined in red on the enclosed Site Location Plan ref. Figure 1 is formally offered for consideration as a residential allocation. Please accept this letter as a representation prepared on behalf of Mr M Biddle to North Somerset's Consultation to the Draft Local Plan 2036; Issues and Options Stage Document.</p> <p>The land as outlined in red on the enclosed plan ref. Figure 1, is offered as a residential allocation; either in its own right or as part of a larger residential allocation. The land is located to the west (and accessed from) Wolvershill Road (Coordinates 338459, 160229), Banwell. The land totals approximately 1.15ha and is a gently sloping, southerly aspect parcel of land outside of the flood plain with excellent communication and transport links to the urban area of Weston-super-Mare and the village of Banwell.</p> <p>The land is outside of the Area of Outstanding Natural Beauty (AONB). It is also in an area at least risk of flooding (Flood Risk Zone 1). The Draft Local Plan 2036: Issues and Options Consultation Document takes forwards the objectives of The West of England Joint Spatial Plan (WoE JSP).</p> <p>The WoE JSP sets out a prospectus for sustainable growth that will help the area meet its housing and transport needs for the next twenty years. It will guide the planning strategies for planning authorities Bristol City, North Somerset, Bath and North East Somerset and South Gloucestershire Councils.</p> <p>The JSP has been submitted to the Planning Inspectorate and it is anticipated it will be examined in Autumn/Winter 2018. It is expected to be adopted in 2019. Given its relatively advanced stage towards adoption, it is the guiding strategy for the next North Somerset Local Plan 2036. The 'Issues and Options Document' informs North Somerset's consultation. It proposes a new garden village on land to the north of Banwell. The vision of this strategic allocation is that by 2036:</p> <p>"Banwell Garden Village will be a thriving new community a short distance away from Weston-super-Mare offering a range of new homes, business, and other uses. Its character will draw upon the semi-rural setting blending sensitively within the landscape to the north of the Mendip Hills AONB. New business space will be provided with good access to the M5 offering an attractive industrial / distribution opportunity, and WSM will provide a focus for employment opportunities, including the nearby Junction 21 Enterprise Area."</p> <p>The objective is that the Banwell Bypass will alleviate existing local roads, including West Street in Banwell and the centre will benefit from an improved environment, enhancing the attractiveness, vitality and viability of the historic village."</p> <p>The 1.15ha area of land the subject of this representation falls entirely within the area of the proposed strategic garden village allocation as shown in the Concept Diagram in the Issues and Options Consultation Document. The land essentially sits within the area identified as Number 5: Higher housing around a mixed use local centre.</p> <p>The land as outlined in the Site Location Plan presents a suitable opportunity for securing additional residential growth for this part of North Somerset. The land owner of this site Mr M Biddle is putting forward an area of land for development that can either be developed independently in coordination with surrounding developer's projects, or it could also be easily incorporated into a master-planned proposal with the remaining proposed strategically allocated areas of land for development.</p>	<p>Ben Lewis - Land at Park Farm, Wolvershill Road - LP Issues and Options Rep.pdf (832 KB)</p> <p>Ben Lewis - Location Plan - Wolvershill Road Banwell P0232-44 (Rev A).pdf (1.2 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The land has a gentle southerly aspect and will no doubt secure good access links to new infrastructure provisions; namely the new bypass being proposed to the north. The land is a sufficient distance from the M5 motorway not to be excessively impacted by noise and pollution from the motorway. The land owner Mr M Biddle would like to respectfully invite North Somerset Council to consider the site as outlined within the red line on the enclosed plan ref. Figure 1 to be incorporated as a / as part of a residential allocation in the next North Somerset Local Plan 2036.</p>	
Newland Homes		<p>It is important to maintain an open gap between new and existing settlements to ensure they remain separate.</p>	
Roe and Huish		<p>As part of this representation, the land as outlined on the enclosed plan ref. 001, is offered as a residential allocation; either in its own right or as part of a larger residential allocation. The land is located North of Summer Lane (338162, 160548), Banwell with the nearest post code being BS29 6LP.</p> <p>The site is a gently sloping, southerly aspect parcel of land outside of the flood plain with excellent communication and transport links to the urban area of Weston-super-Mare and the village of Banwell.</p> <p>The land is accessed via Summer Lane to the south and also adjoins Wolvershill Road to the east. The land is outside of the Area of Outstanding Natural Beauty (AONB). It is also within an area at least risk of flooding (Flood Risk Zone 1).</p> <p>The Draft Local Plan 2036: Issues and Options Consultation Document takes forwards the objectives of The West of England Joint Spatial Plan (WoE JSP).</p> <p>The WoE JSP sets out a prospectus for sustainable growth that will help the area meet its housing and transport needs for the next twenty years. It will guide the planning strategies for planning authorities Bristol City, North Somerset, Bath and North East Somerset and South Gloucestershire Councils.</p> <p>The JSP has been submitted to the Planning Inspectorate and it is anticipated it will be examined in Autumn/Winter 2018. It is expected to be adopted in 2019. Given its relatively advanced stage towards adoption, it is the guiding strategy for the next North Somerset Local Plan 2036.</p> <p>The 'Issues and Options Document' informs North Somerset's consultation. It proposes a new garden village on land to the north of Banwell. The vision of this strategic allocation is that by 2036, "Banwell Garden Village will be a thriving new community a short distance away from Weston-super- Mare offering a range of new homes, business, and other uses. Its character will draw upon the semirural setting blending sensitively within the landscape to the north of the Mendip Hills AONB. New business space will be provided with good access to the M5 offering an attractive industrial / distribution opportunity, and WSM will provide a focus for employment pportunities, including the nearby Junction 21 Enterprise Area."</p> <p><i>The objective is that the Banwell Bypass will alleviate existing local roads, including West Street in Banwell and the centre will benefit from an improved environment, enhancing the attractiveness, vitality and viability of the historic village."</i></p> <p>The Issues and options Document suggests two alternative scenarios to stimulate discussion on the possible options for accommodating the strategic growth. Alternative Scenario 1 identifies further development to the north of the strategic allocation of Banwell Garden Village.</p> <p>The land the subject of this representation falls within the area the subject of Alternative Scenario 1 as shown in the screen shot below (land outlined in red) of the Concept Diagram which has been taken from the Issues and Options Consultation Document</p> <p>The Opportunities</p> <p>The natural option under 'Alternative Scenario 1'</p>	<p>Land at Summer Lane - LP Issues and Options Rep 23.11.18.pdf (333 KB)</p> <p>Fig 1 - Location Plan - Summer Lane Banwell P0232-42 Rev B (002).pdf (881 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The land the subject of this representation is only separated from the strategic Banwell Garden Village by Summer Lane itself and the band of existing housing along the southern side of Summer Lane. The land presents the most suitable opportunity for securing additional residential growth to the north of the strategic Banwell Garden Village under 'Alternative Scenario 1'.</p> <p>The land also has a gentle southerly aspect and therefore there are sustainability attributers to the development of the land; a future development being able to take advantage of solar gains.</p> <p>The land is a sufficient distance from the M5 motorway not to be excessively impacted by noise and pollution from the motorway.</p> <p>The land is not within an area at risk of flooding and it also benefits from an existing mature natural northern hedgerow landscaping that can be retained as part of a future development.</p> <p>The land offers good transport links and there is potential for opportunities to improve the northern section of Summer Lane which adjoins the southern boundary of the site and the opportunity also for the improvement of an important section of Wolvershill Road which no doubt will need to be improved to accommodate substantial additional traffic associated with the Banwell Garden Village development.</p> <p>These opportunities become available with the allocation of the land for residential development as strips along these site boundaries can help accommodate road widening and pedestrian footways as well as new landscape planting. These are discussed further below.</p> <p>Summer Lane</p> <p>The Authority may not yet know whether it will be an objective to secure improvements to Summer Lane to accommodate additional traffic movements or indeed, improvements to accommodate sustainable means of movement; walkways / cycleways. However, if it is, there are limited opportunities to secure these improvements along this section of Summer Lane which forms the boundary of this land.</p> <p>The road is bound by several residential dwellings alongside the southern edge of this stretch of the road.</p> <p>However, the northern boundary of the road (the site outlined red) can accommodate improvements (if required, and indeed if the land itself were allocated for residential development). The land therefore presents the only realistic opportunity to secure infrastructure improvements to this section of Summer Lane; whether these be highway improvements, footway and/or cycle links or indeed green infrastructure improvements.</p> <p>Wolvershill Road currently experiences high levels of traffic for a road that is substandard in width for significant lengths of the road. This road may be considered as a strategic route to the Banwell Garden Village and if so will likely need improvements to overcome these width restrictions.</p> <p>However, there is also a significant 'pinch point' alongside the eastern boundary of the site the subject of this representation; the road narrowing as it passes the site. This is shown in the enclosed images below. The site being to the right hand side of the road in this image which shows the road is insufficient in width to continue the broken white line along the middle of the road. The broken white line continues after the road passes the site towards Banwell.</p> <p>If the land were allocated, a strip on the edge of this allocation could potentially be made available for the improvements to this stretch of Wolvershill Road.</p> <p>We would like to respectfully invite the Authority to consider the site as outlined within the red line on the enclosed plan ref. 001 to be incorporated within a residential allocation in the next North Somerset Local Plan 2036.</p> <p>The site would provide a valuable addition for residential development and securing infrastructure improvements.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Simon Hegarty		A Banwell bypass will simply create major traffic problems for neighbouring villages. More imaginative traffic planning should be adopted. The cost and environmental damage and traffic congestion in other villages means the bypass will fail a cost/benefit analysis.	
Strongvox Homes	Strongvox Homes	Strongvox Homes has legal interest in land set out in 'Alternative Scenario 2' which is subject to Outline Planning Application 18/P/4735/OUT (Land west of Wolvershill Road). The site is well located in relation to facilities within Banwell and is available and deliverable. The site provides a logical extension to this Service Village and can be delivered within the early stage of the Local Plan housing delivery period, the proposal can immediately integrate with local facilities and would not be subject to lengthy development lead-in times - unlike the proposed new village to the north of Banwell and the new village in combination with 'Alternative Scenario 1'. For this reason, 'Alternative Scenario 2' is supported in preference to 'Alternative Scenario 1'. The site should be allocated through the Local Plan review.	1.L01.01K_site plan.pdf (3.5 MB)
The Haynes Family		<p>3.27 We support the principle of a potential strategic development location at Banwell and we consider that development in this area would make a significant and important contribution towards meeting housing need and employment land provision within new Local Plan period and beyond.</p> <p>3.28 In terms of the concept diagram included within the consultation document, we support the general location of development and the general location of the main development area.</p> <p>3.29 Specifically, we support the identified location of employment land with good access to the existing and future road network. We do however, consider that this area should be extended northwards, up to the Grumblepill Rhyne to ensure sufficient employment land is allocated.</p> <p>3.30 We consider it vital that the land between Summer Lane and the M5 (above the Grumblepill Rhyne) is allocated for employment land, some housing and green infrastructure looping around the proposed Garden Village. This will make the most efficient use of land, provide a visual buffer between the motorway and provide an area for ancillary associated infrastructure to support the wider strategic development (such as drainage attenuation ponds and noise buffers). We consider that green infrastructure should be included within any site allocation.</p> <p>3.31 Consideration should be given to the extent and location of the area identified as a potential green infrastructure network which crosses the area of land between Summer Lane and the M5, as this has the potential to artificially constrain employment development to the south with no reasoned justification. If this was located to the north of the Grumblepill Rhyne it could be linked into a wider area for green infrastructure looping around the proposed Garden Village.</p> <p>3.32 Our proposed change to the masterplan approach for the Garden Village is set out in the alternative plan included as appendix A.</p> <p><i>Alternative Scenarios</i></p> <p>3.33 Two alternatives are identified for future development if housing need is not met by the existing sites identified.</p> <p>3.34 To accommodate future growth, we would support alternative scenario 1 as it is outside the floodplain and would retain a separation between the proposed Garden Village and the existing settlement of Banwell. Again, we contend that in order to support the current strategic development requirements, as well as any future expansion, sufficient land needs to be allocated at this stage to provide supporting infrastructure. This is particularly important if areas to the north, for example, need to be developed at some point. Attenuation ponds for example, would be best placed away from future expansion areas to avoid the need for these to be relocated.</p> <p>3.35 We do not support the alternative scenario alternative scenario 2 for new housing development, as extended development to the south east would effectively join the garden village up with the existing settlement of Banwell which will create coalescence, as it would not read as a separate settlement and would swamp the character and infrastructure of the existing settlement of Banwell.</p>	The Haynes Family - site submission.pdf (4.6 MB)

Respondent Name	Respondent Organisation	Comment	Attached documents
Tom Leimdorfer		I think it would be wrong to make any decision before the new Banwell village is established. Then it should be a decision primarily for the two village communities.	
Wessex Water (Ruth Hall)	Wessex Water	Detailed engineering appraisal will be required to consider foul drainage arrangements for proposed development. It is likely that foul flows will be conveyed from the proposal to the Weston super Mare sewage treatment works catchment with alternative scenario 2 closer to existing public foul networks. Alternative scenario 1 will be less advantageous if development is phased from the north with more significant foul sewer assets required from outset to connect to existing services. Engineering appraisal will attract a fee and can be commissioned as appropriate.	
Windsor, Hewish and Hewish		<p>The land as outlined on the enclosed plan ref. Figure 1, is offered as a residential allocation; either in its own right or as part of a larger residential allocation. The land is located North of Summer Lane (338111, 160446), Banwell with the nearest post code being BS29 6LP. The land totals approximately 13ha and is a gently sloping, southerly aspect parcel of land outside of the flood plain with excellent communication and transport links to the urban area of Weston-super-Mare and the village of Banwell.</p> <p>The land is accessed via Summer Lane to the north. The land is outside of the Area of Outstanding Natural Beauty (AONB). It is also in an area at least risk of flooding (Flood Risk Zone 1).</p> <p>The Draft Local Plan 2036: Issues and Options Consultation Document takes forwards the objectives of The West of England Joint Spatial Plan (WoE JSP). The WoE JSP sets out a prospectus for sustainable growth that will help the area meet its housing and transport needs for the next twenty years. It will guide the planning strategies for planning authorities Bristol City, North Somerset, Bath and North East Somerset and South Gloucestershire Councils.</p> <p>The JSP has been submitted to the Planning Inspectorate and it is anticipated it will be examined in Autumn/Winter 2018. It is expected to be adopted in 2019. Given its relatively advanced stage towards adoption, it is the guiding strategy for the next North Somerset Local Plan 2036.</p> <p>The 'Issues and Options Document' informs North Somerset's consultation. It proposes a new garden village on land to the north of Banwell. The vision of this strategic allocation is that by 2036, "Banwell Garden Village will be a thriving new community a short distance away from Weston-super-Mare offering a range of new homes, business, and other uses. Its character will draw upon the semirural setting blending sensitively within the landscape to the north of the Mendip Hills AONB. New business space will be provided with good access to the M5 offering an attractive industrial / distribution opportunity, and WSM will provide a focus for employment opportunities, including the nearby Junction 21 Enterprise Area."</p> <p>The objective is that the <i>Banwell Bypass will alleviate existing local roads, including West Street in Banwell and the centre will benefit from an improved environment, enhancing the attractiveness, vitality and viability of the historic village.</i></p> <p>The 14ha area of land the subject of this representation falls entirely within the western area of the proposed strategic garden village allocation as shown in the screen shot below taken from the Issues and Options Consultation Document. The land essentially sits within the area identified as Number 5: <i>Higher housing around a mixed use local centre.</i></p> <p>The land as outlined in the Site Location Plan presents a suitable opportunity for securing additional residential growth for this part of North Somerset.</p> <p>The land owners of this site (Mrs J Windsor, Mr S Huish & Ms S Huish) are siblings and as such this representation puts forward an area of land for development that can easily be master-planned on its own. However, it could also be just as easily master-planned in conjunction with the remaining proposed strategically allocated areas of land for development.</p> <p>The land has a gentle southerly aspect and will no doubt secure good access links to new infrastructure provisions; namely the new bypass being proposed to the north. It could potentially be independently accessed from Summer Lane and/or accessed via adjoining strategically allocated land.</p>	<p>Land at Laurel Farm - LP Issues and Options Rep.pdf (686 KB)</p> <p>Fig 1 - Site Location Plan - Laurel Farm Banwell P0232-47.pdf (1.4 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The land is a sufficient distance from the M5 motorway not to be excessively impacted by noise and pollution from the motorway.</p> <p>The land owners; Mrs J Windsor, Mr S Huish & Ms S Huish, would like to respectfully invite North Somerset Council to consider the site as outlined within the red line on the enclosed plan ref. Figure 1 to be incorporated as a / as part of a residential allocation in the next North Somerset Local Plan 2036.</p>	
Wrington Parish Council	Wrington Parish Council	Alternative scenario 2 is worthy of further consideration. It clearly separates Banwell from the proposed 'garden village' and steps outside the flood plain, and is therefore sensible.	
Wrington Parish Council	Wrington Parish Council	<p>Acceptable in principle, but subject to strict planning controls as to activities and size of any buildings to be erected. (No huge warehouses or similar such as those seen alongside the M5 around the M5/M48 junction area.)</p> <p>Alternative scenario 2 is worthy of further consideration. It clearly separates Banwell from the proposed 'garden village' and steps outside the flood plain, and is therefore sensible.</p>	

Document Part Name

Q14. Are there any other options you would add for accommodating strategic growth within the Garden Village near Banwell?

Respondent Name	Respondent Organisation	Comment	Attached documents
Avon Wildlife Trust	Avon Wildlife Trust	No comment	
Banwell Parish Council	Banwell Parish Council	There could be further commercial uses between Summer Lane and the M5 to take advantage of this corridor and protect the integrity of the proposed green gap between the villages.	
Blagdon PC	Blagdon Parish Council	We have no specific comments other than there must be close coordination between employment, transport and housing development plans.	
Bloor Homes South West		Whilst the land on the eastern boundary of the Banwell Garden Village site appears on initial review to be heavily constrained in flood risk and drainage terms, Bloor Homes will evidence that effective use of this land can support the delivery of the Garden Village through providing appropriate land for strategic landscaping, ecological mitigation and valuable informal public open space, synonymous with the principles of the delivery of a Garden Community. The inclusion of this land in the concept diagram for Banwell Garden Village should not therefore be overlooked and, indeed, should form an important element of the new community.	Bloor Homes South West OA3029 Banwell GV Representation SUBMISSION.pdf (6.7 MB)
Christopher Day		As the proposal for Banwell Garden village is based on a doubtful premise, it is I fear hard to take these proposed alternatives seriously.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Congresbury Parish Council	Congresbury Parish Council	The lack of details on transport and the impact on A38 and A370 have not been explored. The location is wrong and no option at relocating this development to Ashton Vale has been made which would be in a more sustainable position.	
Hayes Family and Mr Cope		As set out in our representations regarding Banwell Garden Village, we consider that land should east and west of Summer Lane should be allocated for development, for employment use, potentially some additional housing, and supporting infrastructure, including attenuation, noise bunds, and providing strategic ecological mitigation.	
Local Access Forum	Local Access Forum	The LAF agrees that a new M5 junction would probably be key to the success of a community here. Many of the incomers will work in Bristol or Taunton as well as Weston. The bridleway network in Banwell is very poor. The LAF therefore feels that it will be crucial here that any new walking or cycle paths are formally dedicated as multi-user using the definition above, making them as inclusive as possible and giving best value for public money. The new paths also need to be sensibly linked through to the Locking, Hutton and Sandford areas, thus giving safety for all groups of vulnerable road users, as well as allowing people from the more urban areas to safely access this beautiful countryside. A new path from Banwell to Sandford would connect Weston Super Mare paths to the Strawberry Line and paths on to Bristol. It would also enable Banwell school children to cycle to Churchill, thus promoting healthy lifestyles at an early age. A multi-user path would keep non motor traffic off the dangerous A368 between Banwell and Sandford.	
Parish Councils Airport Association	Parish Councils Airport Association	<p>The PCAA's only comment is that the housing in both the Banwell and Mendip Spring Garden Villages will lead to a considerable increase in traffic on the A38. Most people will be commuting to and from Bristol. This means that the commuters will have to travel past Bristol Airport. There will be increased congestion on the A38 and gridlock at the South Bristol Link roundabout. This will lead to commuters finding alternative routes on rural lanes and the A370.</p> <p>The PCAA support a light rail to the airport or mass transit to the airport subject to the project being environmentally sustainable and not harmful to other residents along the route. Access to the light rail and mass transit should be available to commuters from elsewhere such as the Chew Valley. We question, however, how the mass transit and the light rail will avoid impacting the green belt and the timing of delivery.</p>	
Stowey Sutton Parish Council		<p>The PCAA's only comment is that the housing in both the Banwell and Mendip Spring Garden Villages will lead to a considerable increase in traffic on the A38. Most people will be commuting to and from Bristol. This means that the commuters will have to travel past Bristol Airport. There will be increased congestion on the A38 and gridlock at the South Bristol Link roundabout. This will lead to commuters finding alternative routes on rural lanes and the A370.</p> <p>Stowey Sutton Parish Council support a light rail to the airport or mass transit to the airport subject to the project being environmentally sustainable and not harmful to other residents along the route. Access to the light rail and mass transit should be available to commuters from elsewhere such as the Chew Valley. We question, however, how the mass transit and the light rail will avoid impacting the green belt and the timing of delivery.</p>	
The Haynes Family		<p>3.36 As set out above, we consider that land between Summer Lane and the M5 should be allocated as part of the Garden Village development. Our suggested amendments to the masterplan for the Garden Village proposes that additional land be earmarked for employment use and potentially some housing. Additionally, this extra land lends itself to providing supporting infrastructure, including water attenuation, noise bunds, and to provide strategic ecological mitigation. This land could also accommodate more formal sport and recreation activities, such as sports pitches on the edge of, and closely linked to the proposed Garden Village.</p> <p>3.37 Using this land for such uses will ensure that the development potential of the central area can be maximised for housing, education and the creation of a new centre. This will ensure the most effective use of land, in accordance with the NPPF, which seeks to ensure that developments make optimal use of the potential of each site (para 123).</p>	The Haynes Family - site submission.pdf (4.6 MB)

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>4.0 CONCLUSION</p> <p>4.1 As set out in the preceding sections of this statement, we consider that land to the east and west of Summer Lane should be allocated within the new Local Plan 2036, to help deliver and facilitate significant housing, employment land and other community benefits as one of the key strategic development locations identified within the emerging JSP.</p> <p>4.2 It is essential the Garden Village allocation is holistic and takes into account all land uses and supporting infrastructure required. This will ensure that the development opportunity is maximised to ensure the most efficient use of land and sustainable development, in accordance with the aspirations of the JSP and the NPPF. Including the land we have identified to the west of the currently identified area within the site allocation will allow flexibility to provide supporting infrastructure in a more efficient and holistic way.</p> <p>4.3 We believe that our client's land should be included within the Garden Village site allocation as it offers a significant opportunity to facilitate the delivery of a new Garden Village, providing much needed housing, employment land and supporting infrastructure to ensure the creation of a sustainable, self-contained community which has access to everyday facilities and amenities. In our view, and as demonstrated on the Masterplan, contained at Appendix A, this land is key to the success of the Garden Village.</p> <p>4.4 We therefore urge the Council to enter into discussions with our client, including liaising via the workshop process, to allow them to partake in the process of shaping this important development for North Somerset and to secure their land for inclusion within it.</p>	
Wrighton Parish Council	Wrighton Parish Council	Please ensure that infrastructure arrangements are in place before building commences.	

Document Part Name

Q15. Do you have any comments on the proposed vision for Mendip Spring Garden Village?

Respondent Name	Respondent Organisation	Comment	Attached documents
A Baker		<p>We are totally opposed to the proposals for the SDL of Mendip Spring /Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) and there is little local employment. This would result in 5000+ commuters each way daily into Bristol so local roads would be heavily congested as there is little public transport. Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure and creates more pollution with very significant air quality problems.</p> <p>Nearly 300 houses are already being built, in addition to the 2800 in the Issues and Options document. Of these 30% will be affordable but local people are not given priority. The West of England Authorities' own evidence shows that Churchill/Mendip Spring New Town cannot provide affordable housing due to abnormal development costs.</p> <p>The development will cause irreversible ecological damage to Mendip Hills AONB and Windmill Hill and will create a soulless, dormitory town on the good agricultural land in the area.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>There is a better, sustainable alternative by building close to jobs and infrastructure in Bristol on ground of poorer quality than here.</p>	
A Goodhead		<p>I AM TOTALLY OPPOSED TO THIS PROPOSED DEVELOPMENT. We live on Stock Lane, Langford. We have been here since 1994. Over the years, Stock Lane has become a 'rat run' for commuters but more damaging are the huge HGV's. This is not only environmentally damaging but the pollution & noise is becoming intolerable. From the end of Duck Lane, along Stock Lane to Pudding Pie Lane, the country road narrows. The Highways department could not put broken white central lines in these areas simply because it is too narrow to do so. There are very frequent traffic jams due to HGV's blocking the lane. The speed limits are too high & there's a serious accident waiting to happen. The narrow area should be reduced to 20 mph - currently 40 mph in parts. HGV's should be banned from Stock Lane other than for necessary access. Stock Lane floods most winters, more problems. These current issues need to be addressed & resolved, not added to by increasing the population. Inevitably this path would lead to additional traffic problems together with other issues. The proposal to build 2800 additional houses in this rural area is unwanted, undeliverable, Inappropriate & totally unsustainable.</p> <p>We don't have the infrastructure. There's no employment in this area.</p> <p>This 'village' would just create a massive volume of commuters</p> <p>The increase in traffic, despite suggestions of a new road & bypass, is unacceptable.</p> <p>Households in this area need cars. That's a potential minimum of 2800 extra cars, probably double that number if this development goes ahead.</p> <p>All creating more environmental damage, more pollution & more disruption.</p> <p>There is a viable alternative. Houses need to be built close to jobs. There are no jobs here.</p> <p>* There is a proposal to build up to 4,500 houses on a 305-hectare site between the A370 bypass and the Barrow tanks adjacent to the new South Bristol Link Road in North Somerset.</p> <p>* This area would provide the infrastructure and jobs, local buses, the new Metrobus and the reopening of Long Ashton station with easy access to jobs and entertainment. * It could bring in an estimated £5.4million per year in Council Tax if the scheme went ahead.</p> <p>* The roads are already built. The infrastructure is in place. House building can commence.</p> <p>* The site sits between the A38 and A370 and the New South Bristol Link Road with a dedicated MetroBus lane.</p> <p>* £600 million saving by not building new roads across North Somerset.</p> <p>* This area is classified as Green Belt (see Green Belt section and map below) despite industrial units and the new South Bristol Link Road having been built on this very land. North Somerset prefers to urbanise rural North Somerset rather than build on poor quality green belt. * Weston-S-Mare * Weston Town Centre - there is a great deal of potential capacity for creating good-looking 5 or 6 storey mansion blocks, terraces or mews housing (rather than high-rise towers in both Weston and Bristol to match those which already exist in areas such as Clifton and Bath. Build up, not out.</p> <p>Better, feasible, sustainable options.</p> <p>I believe this proposed new development would have a disastrous effect on North Somerset.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
A Gunner		<p>We are totally opposed to the proposal for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village [4.2] is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>Houses should be built near to jobs in the Bristol area. Mendip Spring/Churchill SDL is 15 miles from the city where the main source of employment is. Increased use of cars puts a significant unnecessary and costly strain on existing transport infrastructure.</p> <p>In the case of pollution – the impact of significant increase in car journeys required to and from Bristol where there is very significant air quality problems.</p> <p>40% of land in North Somerset is Green Belt. Just 2& is needed to build 4,500 houses close to the jobs in Bristol.</p> <p>The new South Bristol link road is on Green Belt as is Bristol Airport. Planning Permission was granted by North Somerset Council [Oct 2018] for a temporary extension to the Silver Zone car park on Green Belt at the airport.</p> <p>Wouldn't it make more sense to build on 2% of North Somerset's Green Belt for a dormitory town that the AONB adjacent to the Mendip Hills.</p> <p>People should be encouraged to walk or cycle to the airport, Bristol or Weston super Mare and this will not be possible in the area close to the Mendip Hills.</p>	
A Mathison		<p>I am writing to state that I totally oppose the proposals for the SDL of Mendip Spring/Churchill. Surely the Local Plan 2036 consultation is grossly premature and it is surely wrong to predict or presuppose then outcome of the JSP examination by the independent inspectors. It is absolutely inappropriate for the North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the JSP process and formal examination.</p> <p>Houses should be built near to jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles away from Bristol which would be the main source of employment.</p> <p>There is very poor local public transport. There would be a huge increase in traffic to and from Bristol with a serious detrimental effect on pollution/air quality.</p>	
A Pearce		<p>Ref 4.2 (P 42) Mendip Springs (Churchill) Garden Village (2,800 houses and major roads in Churchill)</p> <p>I strongly object to the proposals for the SDL of Mendip Spring / Churchill.</p> <p>The local plan 2036 consultation for the said development is not appropriate to North Somerset Council to conduct a consultation when very significant issues have yet to be addressed, through the joint spatial plan (JSP) Process and formal examination.</p> <p>It is wrong to predict or presume the outcome of the JSP examination by the independent inspectors.</p> <p>Houses need to be built near Bristol i.e. near where the employment is (Not 15 miles outside Bristol)</p> <p>The impact of increased car use on pollution issues.</p>	
A Wimshurst		<p>I wish it to be known that I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors."</p> <ul style="list-style-type: none"> Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • Transport infrastructure is environmentally damaging. <ul style="list-style-type: none"> ◦ Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. ◦ Pollution - impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems. <p>The additional physical impact on the environment through the additional cars that would on our lanes, would mean that we would be losing the very special nature of the area. We have experienced a tremendous increase in traffic on our lanes without pavement in the last few years and we feel very vulnerable, so you will appreciate that this could only get worse.</p> <p>We know that there is a much better location, supplied by all services, close to Bristol so fail to comprehend why green field sites are being sacrificed in this way.</p> <p>This has not been well thought through and I appeal to a higher authority to make a better informed decision, which could only shelve this plan.</p>	
Alder King (M Cullen)		<p>The University of Bristol considers that there are better and more sustainable locations to accommodate the growth requirements of Bristol, such as its land holding at Long Ashton. A Strategic Development Location (SDL) at Long Ashton, would be better related to Bristol, the City which is the source of housing need and would therefore result in more sustainable patterns of development by reducing reliance on the private motor car. Detailed representations outlining the flawed approach to the JSP's spatial strategy and its identification of SDLs has already been submitted as part of the JSP consultation. Notwithstanding this, and without prejudice, the University of Bristol supports North Somerset Council's proactive approach in seeking to deliver its new local plan, and therefore comments are made to the 'Mendip Spring Garden Village' on the basis that the university has a major land holding in very close proximity to it.</p> <p>2.2 The garden village seeks to deliver approximately 2,675 dwellings up to 2036 with 7.4 hectares of employment land. It has been informed by technical work published through the locational 'dashboards' and SDL templates which themselves informed the JSP. Each dashboard presented an assessment of the suitability of land beyond the nearest settlement boundaries for strategic development at each of the locations detailed in the 'Assessment of strategic development locations beyond settlement boundaries methodology paper'. The constraints mapping, which formerly referred to the SDL as the 'M5 to A38 Corridor (east) - Churchill (CH)', identified the potential for additional strategic growth within the general area north of the A368. It was recognised that this would be dependent on the new M5 – A38 link road, avoiding the AONB and any impacts upon its setting and ecologically sensitive areas. Therefore development is focussed to the north of Churchill and north west of Langford, separated by a strategic gap.</p> <p>2.3 In terms of the key identified constraints upon strategic development potential, it is understood that the strategic development in this location is entirely dependent on new highway infrastructure including the new M5 to A38 link road whereby the proposed Sanford and Churchill Bypass will connect to the Banwell Bypass and M5 to the west. These strategic transport interventions will provide an opportunity for transformational change to the existing settlements along this corridor.</p> <p>Q.15 Do you have any comments on the proposed vision for Mendip Spring Garden Village?</p> <p>2.4 Notwithstanding the university's previous comments concerning alternative SDL locations that would facilitate a more sustainable pattern of development within North Somerset, it generally supports the Mendip Spring Garden Village. However, whilst it is acknowledged that the vision is an aspirational statement, at the same time it should be grounded in reality. In this regard, the expectation that the garden village will be delivered in its entirety in less than 20 years seems overly optimistic. The SDL is entirely dependent on the delivery of a new bypass, and junction on to the M5. Aside from the technical challenges its delivery presents, there is also the fact that a significant land assembly is necessary, requiring multiple ownerships. These constraints are significant, to the point that the University questions what, if any part of the SDL could be delivered during the plan period.</p> <p>2.5 With regard to the projected 2,675 dwellings it is understood that a standard methodology for calculating housing capacity has been used but it is anticipated that further, more detailed work through the Local Plan will refine this figure, informed by more detailed work on the SDL.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex		The consultation is premature. The local plan should be built on the results of the JSP enquiry, and not the other way round. We cannot prejudge the finding of the enquiry, but it is my hope that it will find that the plan to provide housing on the scale proposed in the rural areas close to the AONB is both unsustainable and unaffordable	
Alex		see below	
Alice Barratt		<p>I am totally opposed to the proposals for the SDL of Mendip spring/Churchill. The local plan 2036 consultation for Mendip spring Churchill garden village (4.2) is premature. It is not appropriate for North Somerset council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the independent inspectors.</p> <p>Whilst I realise there is a need for new homes I feel that the houses are planned for the wrong site. Houses should be built close to bristol where the jobs will be. Mendip Spring /Churchill is 15 miles from Bristol.</p> <p>The infrastructure to transport commuters to these jobs and also leisure pursuits is not there. The two main routes in, the A38 and the A370 are both already highly congested. There is very little public transport.</p> <p>The increased levels of traffic on these routes into and around bristol will be significant. This will lead to an increased level of air pollution. There is already an unhealthy level of pollution both in and around bristol on these roads.</p>	
AllyJ		Q15-18: The location is not sustainable and should be moved to Ashton Vale. There are concerns about transport and impacts on A38 and A370 as well as the supporting network (B3133) and with no details on how this will be managed, Congresbury would be choked by traffic. The new Mendip town could cause flooding issues for the moor which could impact Congresbury. This new village fills the strategic gap between Congresbury and Churchill and the proposed development would merge them into one big town. This is an unsustainable location away from the employment hubs of Bristol and Weston Super Mare with no realistic improved transport links.	
Andrew		The JSP must be agreed before this document can be considered. If the JSP isn't agreed, the key roads, especially at Banwell and Churchill, can not be built and therefore the proposed housing at these sites is impossible. I have fundamental objections to the JSP, principally because the proposed development at "Mendip Spring" and the roads at Banwell and Churchill are inconsistent with the objectives of the JSP. Housing development at Ashton Vale would appear to be far more compatible with the JSP objectives.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Andrew		The proposed development at Churchill does not meet the criteria of a garden Village. There is inadequate employment opportunity and poor connections, and it would therefore never function independently. It would simply become a dormitory housing estate for commuters, adding to traffic and be wholly unsustainable. It is also inconsistent with the objectives of the JSP and the site is such that it would result in Congresbury and Churchill becoming part of a large area of housing sprawl. It would also result in the destruction of the hamlets of Brinsea and Honeyhall.	
Andy		<p>Please note that I live in Churchill and am completely opposed to the proposal for a Mendip Spring/Churchill Garden Village for a number of reasons</p> <ol style="list-style-type: none"> 1. There are simply no local employment opportunities to support circa 3000 houses in the area. This means, at best, people will be commuting to Bristol (the main source of employment within 20 miles) – adding huge volumes of traffic with all the associated jams/pollution that entails. This is an area which already has large jams on a daily basis, particularly through Banwell, Congresbury and Yatton. At worst, it will create significant unemployment in a rural area with all the problems that go with it. 2. The proposed area suffers from water dispersal problems as it is – adding all these houses in that area will only exaggerate the problem. 3. The greenbelt will be destroyed. There is a far better option available in Bristol. The new link road has been open and has great transport links into the city (bus & metro bus). There are no houses on the newly opened section. <p>Thank you for taking the time to read the above – it is appreciated. I am well aware of the issues of house building in this country, but truly believe there are better options available than creating a village the size of Wells in the proposed area</p>	
AR Purnell		<p>I am horrified by the council plan for 2,800 houses at Mendip Springs. Houses need to be built near existing jobs and transport systems. Most of the proposed residents would need to commute to Bristol 15 miles away and even with new roads the pollution and chaos caused in this area by the number of cars would be unacceptable (Have you ever tried getting mobile in rush hour around here?).</p> <p>There are more suitable sites closer to Bristol, near the South Bristol Link Road for example.</p> <p>This area needs housing for young people and families, those built on the proposed site would of necessity be expensive, because of the type of land-wetland, farming, OQANB and therefore unaffordable for young buyers.</p> <p>This proposal would destroy village life and make them merge together in a massive blot on the landscape while going against protection of greenfield sites, countryside and wildlife.</p>	
Aston	Aston and Co UK	The same comments apply as for Banwell – consultation is premature. The Garden Village concept has not been proven or adequately justified in terms of viability and the location proposed is an unsustainable compared with expansion at the larger settlements. This part of the emerging plan and the West of England JSP remains unsound.	
Avon Wildlife Trust	Avon Wildlife Trust	As above, we salute the ambition but suggest that Churchill will be an extremely challenging site to deliver the proposed quantity of housing and infrastructure without significant negative impacts on the local environment	
B Kemplay		I wish to object to the Mendip Spring (Churchill) Garden Village.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>According to section 3.1 Settlement Hierarchy in the above local plan the third paragraph states that there has to be a balance between development and sustainability and environmental impacts with developments situated where the need to travel can be reduced.</p> <p>Transport issues will all be made worse by the garden villages. Your supposed reduction in air pollution depends on non-existent (and unlikely) rail links and residents all having electric vehicles. This is as pie in the sky as builders using best practice in the developments. What are the technological advances you are hoping for to offer transport benefits? Hope seems to be a key feature of the plan, including the development of employment a key feature of which seems to be the building of large distribution warehouses. How do these blend into the surroundings? Development of communities is also a hope as they depend upon who lives there not on buildings and green spaces.</p> <p>The plans promote car use as most occupants will work in Bristol, they will also have to drive to large supermarkets as none seem to be included in the plan. As noted recently in the press this discriminates against young people, forcing them to have cars. This will also lead to extra air pollution. Using Churchill Rhyne as part of a drainage solution will result in road pollution destroying a sensitive wildlife feature.</p> <p>The Vale development near Bristol would help maintain the identity of North Somerset villages and protect the Mendip Hills AONB to preserve its valuable tourist trade. It would also put people nearer to the main centre of employment and transport links such as the South Bristol Link road (on green belt), the new metro bus and existing cycle tracks, thus fitting in well with your planning aims. This may be on green belt land but you are happy to develop green belt land else where in North Somerset such as around Bristol Airport.</p>	
Bill Carruthers		I am totally opposed to these proposals and I agree with the very detailed comments from CALRAG which have already been sent to you. There has also been many letters and reports from the Churchill PC which I totally agree with.	
Blagdon PC	Blagdon Parish Council	<p>We support the vision but remain sceptical about the ability to deliver it in a timely and economic fashion.</p> <p>We have yet to see any proposals regarding timescales or phasing.</p> <p>We are concerned about the level and duration of upheaval that will be created over the development period, particularly if road and transport infrastructure is not prioritised over housing and business development.</p>	
Bloor Homes South West		We agree with and generally support the proposed vision for Mendip Spring Garden Village. The aspirational vision sets the correct tone to develop a supportive planning policy context to deliver a sustainable new community to help meet the Region's housing needs in the medium to long term. This includes the potential for development pursued on Garden Village principles to deliver substantial new Green Infrastructure, and for development in this location to take advantage (and contribute where appropriate) to the new transport infrastructure (Strategic Road Network improvements) planned for this area.	
British Horse Society	British Horse Society	The document similarly talks of new walking and cycle paths; the BHS makes the same comment that these should become multi-user, and on the same grounds. The new pathways also particularly need here to be linked to the good network of footpaths and bridleways on the Mendips, and also to the north towards Congresbury and Langford. At present, vulnerable users, are forced onto roads that are already dangerous. A particular difficulty is the B3133 Congresbury to Langford road, carrying far too much heavy traffic already and hazardous to drive, let alone walk, cycle or ride. Another benefit of doing this would be improved facilities for tourism, whatever one's chosen method of transport.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Burrington Parish Council	Burrington Parish Council	Burrington Parish Council believes that this consultation is premature in advance of examination of the Joint Spatial Plan, particularly in relation to the Strategic Development Locations (SDLs) and specifically in relation to the Churchill SDL. These proposals have not been justified in terms of their locations, capacities, social and environmental implications or traffic impacts on the surrounding areas. Reasonable alternative locations like Ashton Vale have not been given sufficient consideration and the advantages of releasing sites from the Green Belt have not been properly weighed against their locational advantages, including proximity to town centre facilities, employment and transport infrastructure. The attached note explains in more detail the concerns of Burrington Parish Council about this consultation and the Local Plan programme which also reflect comments made on the earlier consultation 'Generating Ideas' between 20 November 2017 and 10 January 2018. There is very little information in the latest consultation to demonstrate progress in developing ideas about the proposed SDL, related transport proposals, or their impacts on the surrounding area. As it is clearly impossible to make progress without additional information including, for example, the further evidence on traffic and transport in support of the JSP that was requested by the Inspectors who are examining the JSP, there is no point in trying to progress the Local Plan Review at this time.	Notes on North Somerset Local Plan Issues and Options Consultation_06.09.18.pdf (556 KB)
Burrington Parish Council	Burrington Parish Council	The proposed vision is very weak and vague. What is the local vernacular style of building? How will it function as part of cluster of settlements? The concept diagram does not even show physical linkages between the proposed settlement, Churchill and Langford.	
C Anniuk		<p>I am totally opposed to the proposals for the SDL of Mendip Spring/ Churchill. The Local Plan 2036 consultation for Mendip Spring/ Churchill Garden Village (4.2) is extremely premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint spatial plan (JSP) process and formal examination. It is completely wrong to predict or presuppose the outcomes of the JSP examination by the independent inspectors.</p> <p>There is also a number of other factors that need to be acknowledged and considered with regards to Question 5, Green Belt:</p> <p>Mendip Spring/ Churchill is 15miles from Bristol (the main source of employment). Why not lift the area of Green Belt land surrounding Bristol so that commuters are closer, have access to a wider range of amenities (surgeries and schools) rather than draining the local resources in both Congresbury and Churchill? This will also save pollution due to the commute being much shorter. Bristol and it's nearby surrounding areas also have much better access to good/ regular public transport which Churchill does not. People should be encouraged to walk or cycle to work - it is not possible to walk or cycle to Bristol or W-S-M. It is possible to reallocate this 2% of Green Belt.</p> <p>This dormitory town will be completely soulless and will have destroyed three villages in the process (Congresbury, Langford, Churchill).</p>	
C Chaplin		<p>Referring to 4.2 (p 42) Mendip Spring (Churchill) Garden Village</p> <p><i>"I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors."</i></p> <ul style="list-style-type: none"> • Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) • Transport infrastructure is environmentally damaging. • Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure • Pollution - impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
C Farnworth		I am writing at this stage simply to raise my concern that the Local Plan 2036 includes consultation upon the proposed Mendip Spring Garden Village which is currently subject to a planning enquiry. I do intend to respond in full to the proposals within the Local Plan but not until the matter of this ludicrous proposal have been decided. It seems likely that the Local Plan will require total revision if the inspector finds that the Garden Village Scheme is invalid and therefore it appears that the cart has been placed before the horse in issuing a consultation which presumes the outcome of an independent enquiry.	
C Moorsom		<p><i>I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</i></p> <p>Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol the main source of employment.</p> <p>Transport infrastructure is environmentally damaging. Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. There is a major pollution impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems.</p> <p>40% of land in North Somerset is Green Belt. Just 2% is needed to build 4,500 houses close to the jobs in Bristol.</p> <p>The Green Belt is strangling Bristol. It is not sacrosanct/untouchable. The new South Bristol Link road is on Green Belt. Bristol airport is on Green Belt. North Somerset Council (October 2018) granted planning permission for a temporary extension to the Silver Zone car park on Green Belt at Bristol airport.</p> <p>Rather than build on 2% of North Somerset's Green Belt NSC would rather create a dormitory town in the countryside adjacent to the Mendip Hills. North Somerset Council is encouraging urban sprawl to leap-frog over Green Belt to create a soulless, dormitory town on good agricultural land. All the adjacent Local Authorities have proposals for development on green belt. It is possible to reallocate this 2% of Green Belt. The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty (AONB). This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol. The environmental/ecological damage would be permanent - impossible to mitigate against.</p> <p>Settlement boundaries need to be rigorously maintained to avoid North Somerset villages merging together. To prevent ad hoc, inappropriate development of greenfield sites/countryside. To preserve the character and landscape of individual villages. North Somerset Council's own Landscape Character Supplementary guidelines supports this view. People should be encouraged to walk or cycle to work. It is not possible to walk or cycle to the airport, Bristol or W-S-M.</p>	
Caroline	private individual	I wish to register my wholehearted support, as a local resident, to the comments and objections raised by Churchill and Langford Residents Action Group (CALRAG) in their response dated 7 December 2018 to the above Local Plan.	
Caroline Pinnell	Mrs	<p>I am strongly opposed to the proposed new mendip springs village. I have concerns under the following points.</p> <ul style="list-style-type: none"> • 2800 houses is not a village. This is double the size of Congresbury • The road infrastructure around this area is not set up for this village, even if the new bypass is agreed. The Brinsea road B3133 is busy enough at peak times with queuing traffic at Congresbury traffic lights and also through the small lanes by the vet school • The Churchill Academy last year was the first year that was at maximum intake and this is without any new village. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • The local primary school is at full capacity and people who have moved to the new houses in Churchill are now not able to put their children in the school there. • The head teacher at Congresbury primary school is looking to cap the school intake numbers to 30 from next year. • Why build houses so far outside of the city of Bristol when all of those that live there will then need to commute into the city. Why not use land off the new south bristol link road? • We already have flooding issues in this area and in the lane where the houses are proposed - What will this do to the rest of the houses that are already in situ! • The Mendips are an area of outstanding beauty.... not if there are that many new houses • I am not opposed to change - but please think things through! 	
Chris		<p>I'm opposed to the proposals as they are premature and as key issues are yet to be addressed via the Joint Spatial Plan process and formal examination.</p> <p>Houses should be built near jobs, Bristol will serve as the main base for employment and the roads and transport infract ruction cannot cope already. This planned development is 15 miles outside the city. the increase in car journeys and congestion will lead to pollution and health issues and is quite frankly short sighted</p>	
Chris R		The proposed "garden village" of Mendip Spring is in a totally unsuitable location. No transport links and no nearby employment.	
Chris S		The proposal for a large town in Sandford/Churchill is ill conceived. The current infrastructure is already very stretched. A more suitable site for building would be close to Bristol to avoid yet more cars attempting to journey 15 miles to work with the resultant pollution etc.	
Christopher Day		The section on Churchill and the 'Mendip Springs Garden Village' contain the same level of wishful thinking as those on Banwell, in particular with regard to transport infrastructure and employment. I do NOT support these proposals, which would place a significant area of rural land under tarmac.	
Churchill Parish Council	Churchill Parish Council	<p>1. That the allocation of a Strategic Development Location (SDL) in Churchill parish is not in accordance with National Planning Policy, which seeks to plan for sustainable, wellplanned development, or with the strategic objectives of the JSP itself;</p> <p>2. That the proposed Churchill SDL is unsustainable from a transport and infrastructure perspective and that the road infrastructure proposed is not only environmentally</p>	Banwell PC.pdf (319 KB)

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>unsound and unsustainable but unrealisable without significant central government contributions;</p> <p>3. That the SDL is unsustainable from an employment perspective due to its remoteness from existing employment nodes and the consequent need for the majority of the SDLs new residents to commute to Bristol by car;</p> <p>4. That the proposed Churchill SDL is unsustainable from an environmental perspective, damaging the Mendip Hills AONB, increasing flooding risk and destroying the biodiversity of high-quality rural land,</p> <p>5. That the proposed Churchill SDL will be unable to meet targets during the plan period to contribute effectively to providing housing and/or affordable housing in the region, in accordance with central government policy.</p> <p>6. That community involvement has been kept to a bare minimum, with consultation periods targeted during holidays, and we assert that, based on a door-to-door assessment, the community is overwhelmingly opposed to the level of development proposed in the plan.</p> <p>We suggested that there are far more sustainable and policy-compliant options available for fulfilling the governments housing targets in North Somerset.</p> <p>Bearing in mind our stated belief that your 'Issues and Options' document is premature, and without prejudice to our commitment to defeat the inclusion of the Churchill SDL in both the JSP and your 2026-2036 Local Plan, we draw you attention to our earlier comments in our letter of August 2018 (copy attached at Appendix 'A' below) which responded specifically to the presentation made by your officers to a meeting of the CPC in August 2018..(attached)</p> <p>While we ordinarily welcome engagement with North Somerset Council and would not like to be seen to discourage consultation we do not feel that it is appropriate at this stage in the plan making</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		process.	
Claire Hosgood		<p>I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>I also feel that homes should be built near to where people are wanting to work. Using our country lanes as a means of getting to work will add to the congestion already there. The plan makes no mention of improving the A38 which during rush hour is already heavily congested.</p> <p>The plan also does not appear to take in to account the number of houses that are already being built or have planning granted in the area.</p> <p>The infrastructure is not being improved to meet the needs of all these extra residents.</p> <p>Finally, there are other places with better links to Bristol that could be used instead and these should be looked at first.</p>	
Clare Mees		<p>I am totally opposed to the proposals for the SDL of Churchill/ Mendip Spring. The local plan 2036 consultation for Mendip Spring Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the JSP process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>Also, houses should be built near jobs in Bristol - Churchill is 15 miles away from these jobs! These new houses would put significant pressure on local roads by many increased cars, leading to congestion and pollution. There are not enough public transport links in Churchill/ Langford - those that exist are inadequate and unreliable.</p> <p>I am unhappy that the concept of 'green belt' is being used to stop development as an alternative closer to Bristol on land already identified as development potential by builders. This green belt land is close to jobs, the south Bristol ring road and transport infrastructure. It is not adjacent to the Mendip Hills (AONB). Churchill /Langford is just bordering the Mendip Hills (AONB) and is a beautiful rural area with good quality agricultural land.</p> <p>It would seem common sense to look at moving the green belt slightly to enable appropriate development close to a city where infrastructure and jobs exist, rather than making a new dormitory town in a rural area where few jobs exist and car travel is essential. After all, the new South Bristol link road is actually built through the green belt! Even Bristol airport is built on green belt land! Why did it not matter then, but it matters when it comes to housing? Improved traffic links need to happen between Bristol and the Airport - this should be the priority - not a huge road built across Windmill Hill (Churchill/Langford) and across a beautiful golf course (Mendip Springs).</p> <p>Langford is currently in the process of having 300 houses built in the village (when Churchill/Langford) only had 570 households to start with. This is a huge rise with no extra infrastructure or services. We are not against development in the right place. But enough is enough in our village. We are a rural village not a dormitory of Weston Super mare.</p> <p>Please let common sense and good planning prevail.</p>	
Cleeve Parish Council	Cleeve Parish Council	<p>CPC believe that this development will increase traffic congestion on the A370 as well as the A38 and cause greater congestion at the entry points to Bristol. Environmentally, this is a sensitive area. The damage from this development could be immense. No green infrastructure plan has been yet put forward to view.</p>	

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Collier		<p><i>We are totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors."</i> ALSO</p> <ul style="list-style-type: none"> • Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) • Transport infrastructure is environmentally damaging. <ul style="list-style-type: none"> ◦ Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. ◦ Pollution - impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems. 	
Congresbury Parish Council	Congresbury Parish Council	<p>The location is not sustainable and should be moved to Ashton Vale. There are concerns about transport and impacts on A38 and A370 as well as the supporting network (B3133) will no details on how this will be managed. Congresbury could be choked by traffic 24 hours a day. The new Mendip village could cause flooding issues for the moor which could impact Congresbury. This new village fills the strategic gap between Congresbury and Churchill and we are deeply concerned that development will soon merge them into one big town. This is an unsustainable location as its as far as possible from employment HUBs of Bristol and Weston-super-Mare . Little detail on public transport apart from a comment saying people could use the Strawberry line.</p>	
CPRE Avonside	CPRE Avonside, North Somerset District	<p>CPRE do not support the proposal for 'Mendip Spring Garden Village' which would cause considerable damage to the environment of North Somerset and permanently change the rural nature of the area. It would facilitate unnecessary new roads from M5 to Bristol Airport serving only to satisfy the ambitions for airport growth.</p>	
Cresten		<p>The local context is valued countryside and farmland which this scheme would permanently eradicate, along with the wildlife habitat. Increased traffic and pollution, flood risk due to run-off, a new dual carriageway and the urban form of a new town, only one or two fields' length away from Sandford, would have a seriously adverse impact on the lives of Sandford, Churchill and Langford villagers. JSP studies cast serious doubt on the viability and sustainability of this proposed SDL.</p>	
D Ashford		<p>This expensive consultation is premature, whilst the JSP scheme is being evaluated by the inspectors and by running this consultation it implies that the proposals have been approved. We are a long way off any decisions until the inspectors have completed their examination of the JSP. A classic case of putting the cart before the horse.</p> <p>4.2 I am vehemently opposed to the Mendip Spring proposal. Houses should be built near to jobs to support the governments own policies of green transport. The current proposal is some 15 miles from Bristol where the majority of employers can be found. NSC has failed to attract major employment to the area. This can be demonstrated by the amount of vehicles exiting Weston Super Mare and the surrounding area's every morning, heading into Bristol. The cost of such houses being built in the proposed area will not be affordable as per the BNP Paribas report, the proposal is the least sustainable option - so why do it?</p> <p>5. The argument for building on Green Belt is not really valid. I believe that there are other underlying circumstances as to why NSC are not wishing to build on the alternative site around South Bristol. After all the new ring road itself has been built on Green Belt. The airport is expanding onto Green belt. NSC has recently granted planning permission for a temporary car parking extension for the 'Silver Zone' car park on Green Belt.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Other councils are building on Green Belt. Whilst I understand that many are concerned about building on Green Belt, why not review it's location. After all it is about time! Why not protect the Mendip AONB. This brings many visitors to the area year after year. We should value the AONB by protecting it by adding Green Belt around it, not strangling Bristol's growth and sensible planning. In reality only a small portion of green belt would be lost around by building the proposed Taylor Wimpey development on it which could be replaced elsewhere.</p> <p>7.The Mendip Hills are so important to both the local residents and the many visitors that come to enjoy their beauty. The impact on the Mendip AONB of building the Mendip Spring Village would be damaging and irreparable. They and the surrounding area which make them what they are should be protected for our future generations to enjoy.</p> <p>9. We are in danger of urban sprawl, creeping urbanisation with the proposals, especially in view of the number of houses already being located in Churchill and Langford. Settlement Boundaries need to be reinforced and protected to keep our villages own individual identities.</p> <p>To be honest, I feel that the governments current policy of housebuilding has caused many problems. Apparently there are some 1.4 million potential plots on Brownfield sites according to the CPRE. There are many empty houses which owners should be forced to let or sell. I am even aware of council tenants that are not occupying the houses that have been let to them for one reason or another which could go to those that need them. The policy of excessive housebuilding is not the solution to the housing problem. Making houses affordable is. I do not believe that houses are selling as well as they could and just looking at Rightmove shows that houses including the new builds are being reduced in price. Potentially we are going to see people in negative equity again before long.</p> <p>The general public are being worn down by this whole repeated consultation process.</p>	
D Chedgy		<p>I concur entirely with my husband's (Paul Chedgy) sentiments expressed in his email to you of 7th December 2018 and have therefore substantially copied that email and highlighted a few additions!</p> <p>I live within the Mendip Hills AONB in Somerset about one kilometer from its northern boundary with North Somerset and the A38 and so apprehend that I will be substantially and adversely affected by implementation of the Proposed Development.</p> <p>In common with many local residents in the area, I am very strongly opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for the Proposed Development is premature. It is inappropriate for North Somerset Council (NSC) to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan (JSP) process and formal examination. It is wrong to predict, presuppose or anticipate the outcome of the JSP examination by the Independent Inspectors.</p> <p>I summarise the following points:</p> <p>Green Belt (GB)</p> <p>As I understand it, some 40% of the land in North Somerset is in the GB and, if not adjusted, the GB will operate seriously to restrict the expansion of Bristol. That the GB is not sacrosanct is illustrated by a number of necessary incursions, namely the Airport and the new South Bristol Link Road, to name but two, and all adjacent local authorities, including NSC, have acquiesced in this and/or have proposals for development on GB land.</p> <p>As I also understand it, notwithstanding that:</p> <ol style="list-style-type: none"> 1. only about 2% of NSC's GB would be required to build 4,500 houses (and could be swapped for other land which could be converted to GB); 	

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		<p>2. such houses would be much closer – i.e. by at least 10 -12 miles - to Bristol which would be the main source of employment for their inhabitants; and</p> <p>3. this would significantly reduce car commuter use and so the adverse effect on both transport infrastructure and pollution,</p> <p>4.</p> <p>NSC is nevertheless seeking to commit to the leap-frogging of the GB and the creation of a substantial dormitory town on green field land that will both “suburbanise” a large area of agricultural land and run a serious risk of infilling the countryside presently forming important separations between small hamlets and villages but having no guarantee or, I would claim, likelihood of providing the infrastructure, including many amenities, that would be necessary to establish social cohesion and thus make it a desirable place in which to live.</p> <p>Settlement Boundaries</p> <p>In order to prevent ad hoc and inappropriate countryside development, our local settlement boundaries need to be rigorously maintained to avoid our local villages and hamlets merging together. Indeed, NSC’s own Landscape Character supplementary guidelines support the preservation of the character and landscape of individual villages. This principle is already being stretched by the two significant developments in Langford and elsewhere and, as indicated above, implementation of the Proposed Development would ride roughshod through it.</p> <p>Mendip Hills (AONB)</p> <p>This area, which is very close to, and would be adversely affected by, the above proposed new development, is significantly more environmentally, ecologically and landscape-sensitive than the rather sub-standard GB immediately south of Bristol and the damage thereto resulting from the Proposed Development would be permanent.</p> <p>Transport</p> <p>The proposed new roads are very likely substantially to increase the volume of traffic in the area and particularly in both directions on the A38 that already has become increasingly busy and delay-prone because of the expansion of the airport and the installation of traffic lights in its vicinity. In addition to this point, with the West Country being a prime holiday destination, the roads become particularly blocked during holiday periods. The other major road link to Bristol is by the M5, which is often subject to accidents and delays, which further increases the traffic on the A38 and the A370. How can the proposed road link be of any practical value?</p> <p>Infrastructure</p> <p>Detailed proposals of improvements to infrastructure, should the proposed plans be seriously considered, have not been released but, with health and education already under serious scrutiny, doctor’s surgeries already completely booked, a shortage of teachers and increased flooding in the area, and likely to be more in the future, it does seem very short-sighted for proposals to fulfil a need for increased housing to serve Bristol to be considered to such a large degree in the proposed area, 15 miles away, when there are solutions much nearer the city!!</p> <p>General</p> <p>As indicated above, I understand that some 40% of the land in North Somerset is in the GB. I also understand that the overwhelming majority of the rest either comprises flood risk areas or is in the Mendip Hills (AONB). In these circumstances it does seem to me to be quite unreasonable that NSC should be obliged to provide some 2,800 new homes on a very limited area of remaining land and I hope that it has made strong representations to government for relief from this very onerous and inappropriate obligation.</p> <p>Furthermore, the proposed planning proposals will have a major affect on many Somerset and Sedgemoor villages, and I have seen no evidence that these authorities have been consulted in any way.</p>	

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D hendzel		As a local resident I would like to register my concern regarding the above. I am totally opposed to the proposals for the Strategic Development Location of Churchill/ Mendip Spring. The Local Plan consultation for Mendip Spring Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan process and formal public examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.	
D James		<p>With reference to the Mendip Spring (Churchill) Garden Village - it is totally inappropriate for North Somerset Council to be consulting on this when there are many important issues that have yet to be addressed through the Joint Spatial Plan process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>I am opposed to the Mendip Spring Garden Village as this will create a centre of population from where people will have to travel to the main centres of employment, increasing the use of cars so adding to traffic problems and pollution. The very name "Mendip Spring" is a clue as to the drainage problems that a development here would also produce.</p> <p>It would be sensible to build houses closer to the jobs in Bristol and the argument that this would be on Green Belt Land makes no sense at all when North Somerset Council are very happy to agree to airport expansion and the south Bristol link road both of which are in Green Belt. 40% of land in North Somerset is Green Belt. Just 2% is needed to build 4,500 houses close to the jobs in Bristol. The proposed development of Mendip Spring Garden Village is adjacent to the Mendip Hills ANOB and I am concerned that building there would lead to blurring of settlement boundaries creating leading to merging in this sensitive area.</p> <p>I note you talk of Windmill Hill as being of importance which it certainly is and it links the villages of Churchill and Langford, In the Local Plan document there is no indication on the map to the road that is proposed in the JSP, which would drive right through this area - why is this? It seems devious to me.</p> <p>I am very unhappy with the way North Somerset Council have gone about this whole issue and it seems clear to me that it has not been done properly.</p>	
D Williams		<p>4.2 (page 42) I am totally opposed to the proposals for Mendip Spring (Churchill) Garden village.</p> <p>Houses should be built nearer to the jobs in Bristol. There is very limited employment in the Churchill area.</p> <p>The proposed development is next to the Mendip Hills AONB and the area is more environmentally, ecologically and landscape sensitive than the green belt immediately south of Bristol.</p> <p>The character and landscape of individual villages will be destroyed by a huge soulless dormitory town.</p>	
D.P and H Ellerington		<p>We moved to Congresbury 17 years ago and as beekeepers and organic fruit and vegetable growers we wanted to live in the Countryside and be close to nature and the beautiful North Extension of the Somerset Levels. Over these years we have noticed how much the traffic has increased and also pollution levels due to this as we live on Brinsea Road a lovely country road which is being wrecked by more and more lorries and cars. The planned houses will impact Congresbury and the surrounding villages dreadfully. My Husband and I are totally opposed to the proposals for the SDL Mendip Spring/Churchill Garden village. 4.2.</p> <p>The local plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint spacial plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP Examination by the independent inspectors. Also Green Belt changes in locations identified as making only a limited contribution to Green Belt's purposes. This includes consideration of the land inside the South Bristol link in conjunction with Bristol City.</p>	

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deborah sharp	Dr	<p>I would like to register my strongest objections to your proposals regarding the Mendip Spring Garden Village. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors. Furthermore houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment). The proposed transport infrastructure is environmentally damaging. For eg increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. In addition pollution will result in a significant increase in car journeys to and from Bristol where there is a very significant air quality problems.</p> <p>Finally the building is proposed in an Area of Outstanding Natural Beauty. To build here is a travesty. There are better more sustainable and less environmentally damaging alternative nearer to the city of Bristol.</p>	
Denise Johnston		<p>I am writing to oppose the development of the area near Churchill.</p> <p>The area cannot support jobs for that number of people, so a significant number will be commuting to Bristol/Weston and other locations via the M5.</p> <p>This will add traffic to the already-congested roads through the villages - in particular Congresbury as the only route through to the M5.</p> <p>As a resident on the Brinsea Road in Congresbury I am only too aware of the amount of traffic, particularly HGVs, passing through the village already. Regularly, there is stationary traffic backing-up right through the village from the traffic lights. Adding to the amount of traffic would create gridlock with all the implications for emergency vehicles and commuting problems - not to mention damage to the roads themselves from volume of traffic.</p> <p>Surely, developing the site beside the South Bristol Link Road is the obvious and most sensible choice.</p>	
Denshams		<p><u>Timing</u></p> <p>There are significant fundamental issues to be addressed. It is not therefore yet appropriate to engage in a consultation. Indeed the Joint Spatial Plan is yet to address significant issues and the consultation should await that outcome and not presume the result.</p> <p>Solution: delay the consultation</p> <p><u>Location of major house building to jobs</u></p> <p>Development of this size will require a major town or city from which to provide the employment. There will be many unnecessary commutes to Bristol where much of that employment will be found. That commuting will clash with the airport traffic which is already proving an issue in its own development, and this development will exacerbate that already troubling issue.</p> <p>Furthermore the growing concern on the environment of pollution will be accentuated by this large scale commuting.</p>	

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		<p>Solution: Build the houses on the land now available on the edge of Bristol. This solves both the above issues.</p> <p><u>Concerns regarding development of Green Belt adjacent to Bristol</u></p> <p>Concern has been expressed that the obvious alternative site edging Bristol must not encroach upon Green Belt.</p> <p>Solution to this concern: This green belt Land is of little green belt type of amenity value. It is scruffy land that is affected by road building, waste tips etc.</p> <p>Furthermore, this should be of benefit to Bristol. Bristol has developed eastwards, making the Centre no longer in the Centre. If this centre is where employment arises then development of Bristol on the West puts employment closer to the housing serving it than developing eastward out at Kingswood. Bristol should welcome this.</p> <p>Finally, the sacrosanct nature of green belt has been undermined by the continuing development of Bristol Airport, where green belt considerations seem to be ignored. We have worked in Bristol since 1966 and should understand its employment dynamics better than many.</p> <p><u>Infrastructure around the proposed development</u></p> <p>Even currently there are major log-jams with transport, known to the Council and to us the Constituents. The development sites in Churchill progressing at this time will exacerbate those log jams before any further development. The solution, namely building more roads will be costly add pollution, take even more of rural North Somerset.</p> <p>Solution: Once more development beside Bristol will be preferable. The costly new roads will not be needed. The log-jams will not be increased. The pollution of cars in those log-jams will be avoided.</p>	
Desiree Tomlinson		<ul style="list-style-type: none"> • The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. • Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) • The increased use of cars will put a significant strain on the existing transport infrastructure. Particularly the B3133, this road is already used by a large number of cars. Any increase in traffic volume on the B3133 will increase congestion and the number of accidents on the road. The traffic quite regularly, at least once a week, backs up down the B3133 from the A370 junction for about 500 to 600yds. The B3133 is not a safe road for cyclists due to the narrowness. • The substantial number of lorries that use the B3133 have great difficulty in passing each other due to the narrowness of the road, the B3133 is not suitable for this type of traffic which cause traffic congestion. • Transport infrastructure is environmentally damaging. • Pollution - impact of a significant increase in car journeys to and from Bristol where there are already very significant air quality problems. 	
Desmond Sloyan		<p>As resident of Churchill for thirty years I have witnessed the creeping deterioration of a pleasant village. Once a quiet rural village, increasingly, random housing has been appearing with scant regard for the ambience of the area and with little thought for sensible planning.</p> <p>It is quite obvious that the council is facilitating these developments with minimum thought for the present occupants of the area, let alone for those of future. The increase in traffic pollution, a problem that has grown over the past few years and which, if this housing development is allowed, will become a major hazzard to the people of the area, particularly those accessing the primary and secondary school.</p> <p>I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial</p>	

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		<p>Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment)</p> <p>Transport infrastructure is environmentally damaging. Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. Pollution - impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems.</p>	
DH		<p>I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The local plan 2036 consultation is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the JSP process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors. Key points against the proposals are:</p> <p>The main employment area is Bristol but this proposed development is 15 miles from there. The transport infrastructure is insufficient at present to support the extra traffic to Bristol and any extra infrastructure would be environmentally damaging. There would also be a large increase in pollution.</p> <p>Changes need to be made to the Green Belt as allowed for in the Local Plan. 40% of land in North Somerset is Green Belt and only 2% is needed to build 4,500 houses close to the jobs in Bristol, a far more sustainable location than the proposed Mendip Spring/ Churchill development.</p> <p>The proposed development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty which planning policy is supposed to conserve and protect but this proposal would have an adverse effect. This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol.</p>	
DH		<p>The Local Plan page 26 provides two options for a settlement review which both include "Adjust settlement boundaries to include new (homes) allocations within the boundaries". These proposals , in both options, are forward thinking solutions for the settlement communities to make a small contribution to managing the UK and regional housing crises.</p> <p>The two options are not negative, as they would create an opportunity for a rethink of rural planning and reinvigorate some communities which have become sterile locations without schools, shops or young families. Until this document was published, planning a settlement for the 21st Century was not on the agenda and it needs to be properly considered for future generations. These issues matter now and should not be dealt with by continually deferring the issue to a future date.</p> <p>Following on from the above comments, I would support the "growth based" option 3 for the new hierarchy.</p>	
DM Spiller		<p>I object to the proposals for the SDL - the consultation is premature and possibly illegitimate.</p> <p>Furthermore, I object to the proposed development on these grounds:</p> <p>traffic pollution lack of public transport</p>	

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		<p>flooding inappropriate scale and character interference with AONB lack of local employment</p> <p>There is a choice: we can build all these houses and then build a massive Park-and-Ride car-park on the Ashton end of Bristol to accommodate the thousands of new commuters - or we can build the houses on the same Ashton site, from where people can walk/cycle/use the bus into Bristol.</p>	
Donna Rawlins		<p>I am writing in objection to the Local Plan 2036. Below I have laid out my specific objects to this plan but I would like to be clear that I object to this plan on a completely personal level also. The way this has been brought about has been underhand and deceptive, I am very concerned with the actions of the council in this matter.</p> <p>You have presented this document as if it has already been agreed and this is not acceptable.</p> <p>Referring to 4.2 (p42)Questions 15-18 Mendip Spring (Churchill) Garden Village</p> <p>I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. I agree with CALRAG's statement that it is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>I think that :</p> <ul style="list-style-type: none"> • houses should definitely be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) • Transport infrastructure is environmentally damaging and the Banwell bypass built in isolation will have a hugely detrimental affect on all the villages beyond. The impact of a significant increase in car journeys to and from Bristol will pose a very significant increase in air pollution where there are already air quality problems. Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. 	
Dr Brian Petheram	N/A	<p>The housing would be much better close to Bristol - the Mendip Spring option will cause huge pollution and turn the A38 into a jammed up motorway.</p>	
Dr Moya Wilson		<p>I am completely opposed to this proposed SDL for 2800 houses, nearly twice as many in Congresbury, and about half of it on land within Congresbury's Parish boundary. In my opinion, it is premature to have a public consultation when so much in the JSP has still to be decided, and a formal examination conducted.</p> <p>Houses should be built near the main area of employment, Bristol, thus reducing the number and length of car journeys made by commuters. It is unlikely that the site would ever support more than a few jobs. Public transport in the area is currently inadequate, and there are no proposals to increase it. The pollution from possibly 5000 vehicles, many travelling 30 miles a day round-trip, would be considerable, and against the aims of the government, the WHO, medical authorities, and hopefully of NSC, to reduce emissions, which contribute to global warming and damage our health. Thus the site is unsustainable for transport, employment, and the environment. It is likely it would be a soulless commuter area, with large areas for car-parking, on what is now beautiful, and unspoilt green fields. The effect on nearby roads, especially the B3133 through Congresbury and Yatton, already heavily congested, and the route residents would take to get to the nearest railway station, would be severe. There are doubts about the viability of the proposed development, and whether the Affordable Housing quota would be delivered. Also, most people in affordable housing would have the expense of running two cars.</p>	

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Dr Moya Wilson		<p>It is imperative to maintain settlement boundaries, and distinct villages, avoiding housing development on green fields in the countryside. The villages near this proposed 'Garden Village' are already suffering from these. Please register my objection to the proposed Mendip Spring Garden Village.</p>	
E Folkes		<p>I am totally against the so called Mendip Spring Garden Village but by responding I hope to influence you in some way to making a sensible decision.</p> <p>I am responding specifically in regard to the Mendip Spring Garden Village as covered in questions 15 -18, as this is my particular area of concern.</p> <p>This expensive consultation is premature, whilst the JSPscheme is being evaluated by the inspectors and by running this consultation it implies that the proposals have been approved. We are a long way off any decisions until the inspectors have completed their examination of the JSP. A classic case of putting the cart before the horse.</p> <p>4.2 I am passionately opposed to the Mendip Spring proposal. Houses should be built near to jobs to support the governments own policies of green transport. The current proposal is some 15 miles from Bristol where the majority of employers can be found. NSC has failed to attract major employment to the area. This can be demonstrated by the amount of vehicles exiting Weston-super-Mare and the surrounding area every morning, heading into Bristol. The cost of such houses being built in the proposed area will not be affordable as per the BNP Paribas report, the proposal is the least sustainable option - so why do it?</p>	
E J Spiller		<p>As a resident of Churchill I am writing because of my concerns about the "Local Plan 2036 Issues and Options".</p> <p>The document seems to assume that the garden villages and the road developments are the only viable options and will go ahead. The villages now threatened with large expanses of housing estates are, at present pleasant semi-rural communities. The developments recommended in your document would destroy their integrity.</p> <p>For every dwelling within the new developments there will be at least one car and maybe as many as three. At this distance from Weston super Mare and Bristol cars must be used for travel. Already the roads are at capacity – anyone trying to get to Bristol before 9:30 in the morning will realise that. Another two- to five-thousand cars travelling from the Churchill area, for example could not be accommodated by local new roads because it would only make the congestion on bottle-necks such as the Airport and Barrow Tanks, and the M5 junctions 22 to 16, very much worse.</p> <p>Extra cars travelling to Bristol will have to be parked. There is only limited parking because of Bristol's understandable policy of limiting non-resident parking and encouraging city public transport, bicycles and walking. The current Park and Ride facilities are already stretched and this is unlikely to improve over the next 20 years. If housing is created where car travel becomes necessary, new car parks will be needed on the southern side of Bristol – instead of building those inevitable car parks close to the city, how much better it would be to build the houses there.</p> <p>It would make good sense to redefine the Green Belt which was designated almost seventy years ago, when life was very different: very few homes owned a car and the population was much smaller. If an area equal to the white, non-flood, non-green-belt area shown on your map were to be traded with an area of the green belt around the city there would be many advantages. Housing there would cause less pollution from transport, more people would be able to walk or cycle to work which in turn would give those residents a healthier lifestyle with possible knock-on effects for the NHS.</p> <p>Public transport from Churchill is very limited – there is no railway, buses are infrequent and slow because of the traffic. There is little local employment opportunity.</p> <p>I am also concerned that our AONB, which contains an important Iron Age fort at Dolebury, will be compromised by the change in the view to an apparent suburban sprawl. Windmill Hill, at the centre of Churchill, is a beautiful and much used amenity. Building so close and to the extent suggested can only spoil this area destroying much of the wildlife habitat and altering the drainage and air quality causing irreversible ecological damage.</p>	

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		<p>The 2800 houses, euphemistically called Churchill's garden-village, is proposed on some of the better farming land around here. It would increase the local flood risk because of the inevitable increase in hard surfaces. The area undulates between only 5 and 20 metres above sea level with many drainage rhynes. Building in such wet ground would be expensive and these costs could remove the possibility of "affordable housing".</p> <p>Some extra roads and bypasses are proposed. It is well known that new roads encourage more road traffic. I would agree that traffic lights or some sort of bypass of the Banwell A368/A371 junction needs to be worked out but this should be independent of other planning matters and a purely local road. An M5 Junction 21A would soon create as much extra traffic through the area as it was hoped to remove – Banwell village centre would soon become a popular rat-run. The Sandford & Churchill Bypass would only shift more cars onto the A38 and B3133 pinch-points. As it is the A38 through Churchill is often reduced to a crawl when the M5 becomes overcrowded or blocked by its regular accidents.</p> <p>I believe the plan as it stands is not sustainable and its implementation would cause harm to the environment. A real alternative needs to be sought that will enhance rather than devalue life in North Somerset.</p>	
E Johnson		<p>For the record I would like it noted that I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <ul style="list-style-type: none"> • Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) • Transport infrastructure is environmentally damaging. • Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. Bus services are currently inadequate and being cut and do not supply offer sensible routes for the current population. • Pollution - impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems. 	
E Lyons		<ol style="list-style-type: none"> 1. Affordable Housing at Mendip Spring will be unaffordable and would be unlikely to be build due to the abnormal development costs associated with the high water table across this area. 2. Air Quality at Bedminster Down in Bristol is already regularly breaking the UK and EU acceptable levels. There is no plan for how Bristol's Air Quality levels will cope with the thousands of additional commuters from Mendip Spring and Banwell to Bristol annually. 3. In Bristol Airport's Business Plan 2017-2035 Exec Summary 'at 15 mppa [million passengers per annum], which is expected to be reached in around 2035...it is expected to support an additional 450 jobs (300 FTEs).' 300 Full Time Equivalent Jobs, most on zero hour contracts, is a very small number of additional jobs over the life of the JSP/ Local Plan 2035. From the planned almost 6000 new houses in Mendip Spring there could be up to 12,000 or more jobs needed. 4. The car distances from Churchill, in NSCs documents, are incorrect. 5. Local employment is very limited and there is no cogent evidence that this will change thus resulting in vast increase in commuter traffic to and from Bristol. 6. It is our responsibility as residents to preserve for future generations the countryside and villages in this beautiful part of North Somerset and so it would be an abrogation of that responsibility not to oppose the present proposals for the SDL of Mendip Spring, which in any event are both unsustainable and undeliverable. 7. In the absence of the SDL of Mendip Spring having being consulted upon it is a wholly misconceived exercise to consult upon the SDL of Mendip Spring in the Local Plan 2036 Issues and options. 8. Consultation is premature and should only take place once the outcome of the formal examination of the JSP is made known. 9. The outcome of the JSP could render the Local Plan 2036 obsolete and so a waste of taxpayers money. 10. There is massive opposition to the proposals for the Mendip Spring new dormitory town following the JSP consultation in November 2017 - January 2018. 11. Houses should be built near jobs, south of Bristol. Bristol has one of the fastest growing rates of employment in the UK. The houses for the West of England are needed for this growth in Bristol. North Somerset Council should support the growth of jobs in Bristol, take advantage of the housing need in its 	

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		<p>neighbouring Local Authority, build houses and a tech Park in The Vale. The transport infrastructure is already in place in South Bristol, the land is poor agricultural land. North Somerset Council could very quickly start to receive council tax and business tax.</p> <p>12. Oppose proposal for the SDL of Mendip Spring/ Churchill as are fundamentally unsound.</p> <p>A new commuter town at Mendip Spring would go against national planning policies and NSCs own policies. It would almost certainly be a planning failure and a retrograde step.</p> <p>The recent independent report 'transport for new houses project July 2018', summaries the negative impacts of all recently built commuter towns except Poundbury. 'most new developments we have seen, particularly those built in large greenfield sites on the edges of towns, are designed for travel by cars. They have plentiful car parking, but limited access to public transport, limited facilities and services, and a lack of safe pedestrian or cycling routes to town centres of the surrounding area. The new 'urban extensions' and 'garden villages' by their very location away from large conurbations promote car-based living...</p> <ul style="list-style-type: none"> • thousands of new journeys on the roads • undermining aspirations of active life styles, vibrant and less isolated communities • people face longer commutes • pepper-potting large new housing estates into the countryside requires long commutes and late returns home, family life suffers • lack of opportunities for those who don't drive, notably teenagers and older people, and those with disabilities • a barren public realm dominated by parked cars and road access with little greenery <p>'Transport for New Houses Project July 2018', provides recommendations:</p> <p><i>'build new housing in existing large urban areas, or in places that are close to, and well connected by public transport, walking and cycling'</i></p> <p>5. Green Belt</p> <ul style="list-style-type: none"> • <i>The Green Belt around Bristol is strangling the city</i> • <i>The Green Belt's original intention to stop urban sprawl from the city simply means that house building is to jump over North Somerset's Green Belt and the beautiful countryside will be urbanised here instead.</i> • <i>The other three adjacent Local Authorities in the JSP have decided to release Green Belt for house building.</i> • <i>A Green Belt assessment should have been carried out for NSC, it is not evident</i> • <i>The Green Belt is not sacrosanct, even in North Somerset:</i> <ul style="list-style-type: none"> ◦ <i>The new South Bristol Link road cuts across NSC Green Belt</i> ◦ <i>Bristol Airport is on Green Belt</i> ◦ <i>Bristol Airport has just been granted planning permission (October 2018) by NSC to extend the Silver Zone car park on the Green Belt.</i> • <i>The Green Belt south of Bristol is:</i> <ul style="list-style-type: none"> ◦ <i>NOT good agricultural land</i> ◦ <i>NOT used for recreation by residents of Bristol (who instead travel to the Mendip Hills AONB and our villages).</i> ◦ <i>BUT it has a refuse dump</i> • <i>40% of land in North Somerset is Green Belt. Just 2% is needed to build 4,500 houses close to the jobs in Bristol.</i> • <i>Green Belt can be reallocated and could be reallocated to this area besides the Mendip Hills AONB.</i> 	

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E Porter		<ul style="list-style-type: none"> • Transport Commuter Congestion to Bristol and Weston-S-Mare. <ul style="list-style-type: none"> ◦ Travelling in the mornings and evenings is already a significant problem. The new developments in Churchill and Banwell, including the new roads, will simply make this worse. ◦ Commuting distances from Churchill: Bristol city centre 16 miles Weston-S-Mare town centre 9 miles (not 3-4 miles as stated the JSP document). ◦ Narrow village lanes are inadequate to cope with an estimated 10,000 extra vehicles daily. <p>(It can take up to 20 minutes to travel a few hundred yards along Stock Lane at the present. Heaven alone knows how long it will take if the proposal goes through!)</p> <ul style="list-style-type: none"> ◦ Public Transport: None planned. ◦ Airport Expansion: Major development and transport infrastructure are required to the north of the airport and adjacent to Bristol, not more than 7 miles to the south. <ul style="list-style-type: none"> • Employment : <ul style="list-style-type: none"> ◦ There is limited current local employment in this rural village. ◦ North Somerset officers at the Churchill 'drop-in' consultations appeared to rely on Thatcher's alone to provide local employment for the 2,800 new homes. ◦ Most jobs will be in Bristol, Bath, Swindon, Gloucester, Cardiff and some may possibly be in Weston-S-Mare. All will need cars to get to work. ◦ Little opportunity to provide local employment for those who wish to walk or cycle to work. • Environment Mendip Hills - Area of Outstanding Natural Beauty (AONB) <ul style="list-style-type: none"> ◦ Enjoyed by everyone in Churchill and the many visitors from Bristol and Weston-S-Mare. ◦ Instead of rolling countryside, the view from our Mendip Hills will be a 2.3 mile sprawl of 2,800 houses adjacent to this beautiful part of Somerset. ◦ Pollution: Noise, Air and Light pollution will increase significantly. Lorries, vans and cars from the motorway will have a direct route through Churchill. ◦ A major loss of hedgerows, trees, agricultural land, farm animals and wildlife habitats. ◦ A new and unwanted road will plough across the village playing field and football/cricket pitch, the only real local amenity. <p>So much for the current efforts of the Government and NHS to tackle obesity!.</p> <ul style="list-style-type: none"> • Effect on local business <ul style="list-style-type: none"> ◦ Urbanisation of the countryside, according to concerns already made by some local tourism businesses, will have a negative impact on hotels and B & Bs which rely on the Mendip Hills and our rural village life. <p>We believe that this plan is unsustainable, unworkable, and undesirable and that there is another practicable alternative solution available, at Long Ashton off of the Bristol Ring Road.</p>	

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Elizabeth English		<p>Mendip Spring (Churchill) Garden Village Local Plan 2036</p> <p>I would like to object in the strongest possible way to the above plan.</p> <p>I am sure you have a deskful of objections setting out the formal reason for not proceeding with this development and I certainly endorse them all.</p> <p>Any development of this size should be built nearer job opportunities - ie in the Ashton Vale area and nearer Bristol where public transport is more available and further commuter traffic, which is already dreadful on the A370, would not cause yet further queuing.</p> <p>If this development proceeds it completely misses the point of the green belt- it should not be leap frogged and destroy a much loved rural area. Keep this area green.</p> <p>Please please do not allow these plans to proceed - it is ill thought out and an ecological and in terms of landscape a disaster.</p>	
F Beach		<p>It is totally inappropriate for North Somerset Council to consult on this issue before it has been examined by the JSP Public Examination process. This consultation is an attempt to pre-judge that process and is a gross mis-use of tax payers money.</p> <p>I have expressed my opinions in my comments to the JSP submitted on the 9th January 2018 and I re-iterate my edited comments below:</p> <p>This development is completely in the wrong place and is not in any way in line with National Planning Policy which advises that development should be sustainable and well planned. There are very few jobs available locally and the majority of existing villagers commute daily to Bristol, it is highly likely that homeowners on this new proposed development would do the same, adding a further 3000 cars to the already considerable congestion along the A38 into Bristol. There is no convenient rail service and the bus journey times are far too long to make this a viable option. Cycling to Bristol or to Weston is impractical.</p> <p>The City of Bristol has the greater need for homes and it would make much more practical sense to locate this new development on the outskirts of the City, such as in the Vale adjacent to the new South Bristol Link Road, where transport links can be accessed and other environmentally friendly methods of transport are practical.</p> <p>The villages of Churchill and Langford are both Conservation areas and this new development would not be sympathetic to this. In addition they are located adjacent to the Mendip Hills and contain much environmentally sensitive rural land. This has been recognized by North Somerset planners with the stringent planning controls they enforce on any minor developments in order to protect the local bat population, yet they are happy to sacrifice 700 acres of rural land in order to build what is effectively a new town. There is a huge contradiction here.</p> <p>The Churchill development is unlikely to offer much, if any, affordable housing, the West of England Authorities' own evidence demonstrates that abnormal development costs would produce this outcome. There is no indication of any contributions towards new roads, schools and community facilities by the authority pushing for this plan. Further, the flooding plain assessment of the Churchill development appears to miss the obvious and the ongoing flooding in Blackmoor (Langford) as yet to be resolved by North Somerset County Council will be greatly exacerbated by the road passing through the flood plain linking the development to the A38. The Sewerage system is often overwhelmed in this area, and some 2,800 additional homes will result in continuous surcharging from the pumping stations at Blackmoor and Sandford to the local water courses (and homes). Most of this land is exceedingly low lying, and although is not on the map of areas subject to flooding, most local residents know that in practice much of the area does flood. Building here may result in flooded homes and will certainly contribute to existing flooding in Langford, Churchill and Sandford.</p>	
G Yule		<p>Referring to 4.2 p42 Mendip Spring (Churchill) Garden Village Questions 15 to 18 I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The local plan 2036 consultation for Mendip Spring/Churchill is premature. It is inappropriate for North Somerset to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan (JSP) process & formal examination. How can the outcome of the JSP examination by the Independent Inspectors be predicted or presupposed.</p> <p>I am very concerned about the huge impact on the extra traffic and air quality on the surrounding area. The proposed dual carriageway will have to cross stock lane and eventually join the already busy single track A38 which will create more holdups. This proposed new road will just increase road use not reduce it.</p>	

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Gabrielle Wilson		I am opposed to the proposals for the SDL of Mendip Spring/Churchill. The consultation is premature as significant issues have yet to be addressed through the JSP process. The proposal for large numbers of houses in this area is inappropriate as it would result in the merging of existing villages, whose settlement boundaries should be maintained to preserve the character and landscape of individual villages such as Churchill, Congresbury and Wrington. Issues of transport infrastructure and provision of local services such as education would make this development unsustainable. New housing should be built closer to the main centres of employment and where sustainable transport provision can be made.	
GELLYBELLY		<p>I am very concerned about the proposals for a Strategic Development Location at the site of Churchill/Langford and the proposed Mendip Spring Garden Village of 2800 properties and associated major road development. I do not support <u>any</u> proposals for any development of any sort in the location identified and neither does my husband.</p> <p>With regards to Q 15 to 18, section 4.2 (page 42) I want to register that <i>we are totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</i></p> <p>Also we have the following comments to make:</p> <ul style="list-style-type: none"> • If any houses need to be built in the future they should be adjacent to Bristol such as on the Ashton Vale area, the main source of employment nearest the bounds of North Somerset. Mendip Spring/Churchill SDL is 15 miles from Bristol. Current traffic levels are horrendous and adding another 2800 houses-worth of traffic to the existing routes is unthinkable! No doubt the planning developers don't sit in those queues on a daily basis or they would suggest adding more cars to them. And if they think the residents will be using public transport they're clearly not used to getting a bus at 6.30am in order to get into Bristol for 8.30am. • Transport infrastructure is environmentally damaging. <ul style="list-style-type: none"> ◦ Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. Extra cars will be travelling through areas of prime agricultural land and livestock, leaving a trail of pollution to damage the very countryside that has made this area famous for its beauty. The impact of a significant increase in car journeys to and from Bristol where there is already significant air quality problems is going to compound the problem. 	
Geoff Matthews		<p>You will probably not want to receive these comments on your latest consultation about the 2036 proposals. Basically you are still assuming that the developments on a huge scale will go ahead in the Churchill/Banwell area and all of your questions take this as the base.</p> <p>I strongly disagree with this assumption and think it is absolute madness to add over 5,000 houses to a location 18 miles from where the bulk of the residents will have their jobs. The provision of a road to get some of them more speedily to the A38 south of the airport will only scratch the surface of the infrastructure needed to get them (and the current commuters) to work in Bristol. I travel in regularly for 9.00 am meetings and already have to leave at 7.30 am to get there on time. The new section of ring road is already log-jammed from the A370 back up to the roundabout on the A38 at that time. Add another 5,000 cars, at least, to this and there will be chaos.</p> <p>You have not listened, and the clear answer is to have the additional housing much closer to Bristol where public transport and other route options exist. This may mean taking some of the green belt away, but this could be offset by extending green belt designation in other parts of North Somerset - especially close to the Mendip Area of Outstanding Natural Beauty.</p> <p>I am hopeful that the JSP examination will address this point and reject your overall conclusions. You are wrong.</p>	

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H Parry		<p>I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment).</p> <p>Transport infrastructure is environmentally damaging</p> <p>...Increased use of cars puts a significant, unnecessary, and costly strain on existing transport infrastructure,</p> <p>.....Pollution – impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problem.</p>	
Heather Walker		<p>I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring /Churchill Garden Village is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the independent inspectors.</p> <p>Houses should be built near to the jobs in Bristol.</p> <p>Green Belt is strangling Bristol. Surely to build adjacent to South Bristol ring road would be far more sensible than concreting over top quality agricultural land to form a dormitory town.</p> <p>Settlement boundaries need to be rigorously maintained to avoid villages merging together.</p>	
I Shuttle		<p>I would wish register my opposition to the proposals for the SDL of Mendip Spring/ Churchill.The local plan 2036 consultation for the said Garden Village(4.2) is in my view premature.It is not appropriate for NS Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan (JSP) process and formal examination.It is wrong to predict or to presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>This proposed new Village (Town) is effectively a suburb of Bristol where the residents will in the main have relocated from and will travel daily to work.The carbon foot print cannot be justified and is illogical.The roads will be congested with hundreds of extra vehicles making their daily commute .The logical location for this housing is within Bristol or if this is not possible to expand it's boundary.If necessary serious consideration should be given to shifting the green belt further west and ideally to the foothills of Mendip AONB.</p> <p>As North Somerset Council you have the authority and are therefore the custodian of our country side and should seriously consider the consequences of destroying our environment .You have in my mind a duty to support the views of your electorate who I believe overwhelmingly object to these proposals.</p>	
Ian Hoddell		<p>It is illogical, premature and massively wasteful of public cost and community energy pursuing this proposal in detail when the principles set out in the Joint Spatial Plan are fiercely opposed and have yet to be examined in public.</p> <p>The shortfall in housing is well understood. New housing is urgently required. It must however be affordable, accessible and where people wish to live. The Churchill Garden Village proposal fails to meet any of these criteria The release of land for housing development must also respect national policies as to location. This proposal offends all those policies relating to highways, traffic, public transport, proximity to employment, ecology, environmental damage including landscape and</p>	

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		<p>the neighbouring AONB. There are no proposals in the Plan to satisfy any of these issues or mitigate serious existing flooding which can only be compounded by the suggested development.</p> <p>In short the proposals are totally unsustainable.</p> <p>Astonishingly this " Issues and Options Document " examines no other new housing options whatsoever. The most obvious would be the release of poor quality land on the southern edge of Bristol close to the City Centre where the huge majority of occupiers will work and where there are excellent public transport, cycle and pedestrian links. The declared objection to this expansion is that the area is in the Bristol Green Belt which is seriously outdated as it is stifling employment growth in one of the UK's most successful cities. It is Bristol that needs the new housing. The Green Belt would be hugely enhanced by extending it to the south to the Mendip Hills AONB including the high landscape value area proposed for the Churchill Garden Village. This would benefit not least the residents of Bristol who gain little enjoyment from the land adjoining the city.</p>	
J and A Brown		<p>We are totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the JSP process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the independent inspectors.</p> <p>It will also cause more congestion on the roads as there are no large employers locally so all traffic will have to travel to the city for work. The idea of constructing a road across Havuatt Common to join the A38 is absolutely crazy as we have enough congestion and accidents on the junction of the Ashley Lane/Havyatt Road.</p>	
J Barrett		<p>We are totally opposed to the proposals for the Strategic Development Location of Churchill/Mendip Spring. The Local Plan consultation for Mendip Spring Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan process and formal public examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p>	
J Falconer		<p>I am completely opposed to the proposals for the SDL of Churchill /Mendip Spring, please note the following points:</p> <p>The Local Plan 2936 consultation for Mendip Spring Garden Village (4.2) is premature.</p> <p>It is not appropriate for N. Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan (JSP) process and formal examination.</p> <p>It is entirely wrong to predict or presuppose the outcome of this JSP examination by the independent inspectors.</p>	
J Herbert		<p>We wish to object to the proposed construction of such a large number of houses, the 'Mendip Garden Village', in addition to those already under construction and to the construction of the proposed dual carriageway linking the M5 to the A38 at Coxes Green.</p> <ol style="list-style-type: none"> 1. It is clear that the proposals will totally change the character of Churchill, Langford and neighbouring villages. 2. There is totally insufficient local infrastructure in terms of jobs, transport, schools, shops and doctors. 	

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		<p>3. Employment locally does not currently support this development, both in terms of numbers of jobs or level of income needed to afford houses in this area. It is most likely that new households would be obliged to commute for work and schools and use roads already suffering gridlock at busy times of day.</p> <p>4. The proposed dual carriageway will run some 200 metres south of our home cutting us off from access to our village of Langford. The busy link between Wrington and Langford will be cut, with it access to the A38 south and our supermarket and principal petrol station. The proposed road coupled with the proposed housing will create major problems for the A38 which is already inadequate at peak times and when blockages arise on the M5.</p> <p>5. Further more why route the road to both Churchill and Coxes Green, a far better access point to the A38 would be join the existing Langford bypass.</p> <p>6. It is overwhelmingly common sense that the location for the proposed housing development should be in the area adjacent to the South Bristol Link Road and the A370. I understand that this is Greenbelt, but, presumably it could be moved/ re-designated by the short distance necessary. It is not land much used for recreational purposes and would cause the least disruption to neighbouring homes. It would provide the shortest access to existing jobs and infrastructure. Green belt arguments apart, what possible reason could there be not to locate the proposed housing there? Does the greenbelt argument outweigh the huge impact of the proposed 'garden village'?</p> <p>7. We fully support the detailed objections put forward by Churchill and Langford Residents Action Group</p>	
J Jolly		<p>I am writing to express my total objection to the proposal to build 2800 new homes in the Mendip Spring/ Churchill area. Residents in these new houses are more than likely to work in either Bristol or Weston Super Mare. Neither the public transport nor the roads will be able to cope with this additional volume of traffic. Neither will the surgeries or hospitals be able to cope with this additional volume of people. Does the plan propose a new hospital? Does the plan take into account the additional pollution caused by these people travelling to work? Does it take a realistic view on the problems these new residents will have getting to work? No.</p> <p>I must admit that I sympathise with North Somerset Council. Government have dictated housing policy irrespective of whether an area is in need of new houses. However , I cannot agree that to meet government targets protecting Green Belt areas is still a necessity. Green Belt areas were designed to stop the sprawl of towns into rural areas. The government requirements for new houses has made Green Belts outdated in so much as the sprawl is now being planned in the rural areas themselves.</p> <p>Nowhere is going to be ideal for these additional houses but if the work is going to be mainly based in Bristol or Weston super Mare, these houses should be built on the outskirts of these areas to avoid additional traffic problems and pollution.</p> <p>An obvious area must be Ashton Vale if the increase in jobs is anticipated to be in Bristol.</p>	
J Kinsman		<p>I write to convey my alarm and opposition to the Local Plan 2036. In my view it proposes a transformation of the whole area when other alternative locations would be preferable and far less destructive to the environment and peoples way of life.</p> <p>It makes no sense whatsoever to build a new village 15 miles from Bristol. Infrastructure here is creaking already. Any development should be close to the Bristol ring road to spare this area becoming gridlocked.</p> <p>Developments already underway are already compromising this area of outstanding natural beauty. Settlement boundaries need to be rigorously maintained to preserve character and landscape of villages. So, let us have a thorough reconsideration of this thoroughly detrimental plan. you can be assured of my active opposition-and the opposition of many people locally. The area deserves better than this.</p>	

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J Lyons		<ol style="list-style-type: none"> 1. I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill.2 2. It is premature to consult on the SDL of Mendip Spring/Churchill (4.2) Local Plan 2036 Issues and Options. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.3 3. The SDL of Mendip Spring/Churchill has not yet been consulted upon, this omission has been documented by the Independent Inspectors. It is therefore not appropriate to consult upon the SDL of Mendip Spring/Churchill in the Local Plan 2036 Issues and Options when the principle of Mendip Spring/Churchill has not yet been accepted and could be rejected.4 4. The outcome of the JSP will feed into the Local 2036, this could result in significant changes, and this Local Plan 2036, Issues and Options would become obsolete. There is already a Local Plan 2026 in place so it would be logical and appropriate to wait for the outcome of the JSP examination. This consultation is a waste of taxpayers' money.5 5. It is our responsibility, as residents, to preserve for future generations the countryside and villages in this beautiful part of North Somerset, one of North Somerset's greatest assets. Proposals for the SDL of Mendip Spring/Churchill would lead to covering vast acres of agricultural land with tarmac and concrete beside the Mendip Hills AONB. The unsustainable and undeliverable Mendip Spring/Churchill commuter town is not the legacy that North Somerset Council should leave to our children and grandchildren.6 6. There is unprecedented opposition to the proposals for the Churchill/Mendip Spring new dormitory town following the analysis of the JSP consultation in November 2017-January 2018. 7 7. Local employment is very limited in this part of North Somerset and there are no indications that this will grow. The vast majority of Churchill and Langford residents commute to Bristol. Residents of the proposed 2,800 houses of Mendip Spring/Churchill new commuter town and the proposed 3,200 houses of Banwell, would also drive in their cars to Bristol.8 8. Houses should be built near to jobs, south of Bristol. Bristol has one of the fastest growing rates of employment in the UK. The houses for the West of England are needed for this growth in Bristol. North Somerset Council should support the growth of jobs in Bristol, take advantage of the housing need in its neighbouring Local Authority, build houses and a tech park in The Vale. The transport infrastructure is already in place in South Bristol, the land is poor agricultural land. North Somerset Council could very quickly start to receive council tax and business tax.9 9. It should be noted that car distances from Churchill, in North Somerset Council's documents, are incorrect. Churchill Post Office to: <ul style="list-style-type: none"> • Bristol Temple Meads is 15 miles • Weston-super-Mare is 9 miles (not 3-4 miles as in NSC documents) • Bristol Airport is 6.5 miles (not approximately 5 as in NSC documents) • It is not possible to cycle or walk these distances to work 10. In Bristol Airport's Business Plan 2017-2035 Executive Summary "At 15 mppa [million passengers per annum], which is expected to be reached in around 2035... it is expected to support an additional 450 jobs (300 FTEs)." 300 Full Time Equivalent jobs, most on zero hour contracts, is a very small number of additional jobs over the life of the JSP/Local Plan 2035. From the planned almost 6000 new houses in Mendip Spring/Churchill and Banwell there could be up to 12,000 or more new jobs needed. 11. Air Quality at Bedminster Down in Bristol is already regularly breaking the UK and EU acceptable levels. There is no plan for how Bristol's Air Quality levels will cope with the thousands of additional commuters from Mendip Spring/Churchill and Banwell to Bristol annually. 12. Affordable housing at Mendip Spring/Churchill will be unaffordable and would be unlikely to be built due to the abnormal development costs associated with the high water table across this area. 	
J Lyons		<ul style="list-style-type: none"> • A new commuter town at Mendip Spring/Churchill would go against national planning policies and North Somerset Council's own policies. It would almost certainly be a planning failure and a retrograde step. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>1. The recent independent report, “Transport for New Houses Project July 2018”, summarises the negative impacts of all recently built commuter towns except Poundbury. <i>“most new developments we have seen, particularly those built on large greenfield sites on the edges of towns, are designed for travel by cars. They have plentiful car parking, but limited or no access to public transport, limited facilities and services, and a lack of safe pedestrian or cycling routes to town centres or the surrounding area. The new ‘urban extensions’ and ‘garden villages’ by their very location away from large conurbations promote car-based living...</i></p> <ul style="list-style-type: none"> • <i>Thousands of new journeys on the roads.</i> • <i>Undermining aspirations of active life styles, vibrant and less isolated communities.</i> • <i>People face longer commutes.</i> • <i>Pepper-potting large new housing estates into the countryside requires long commutes and late returns home. Family life suffers.</i> • <i>Lack of opportunities for those who don’t drive, notably teenagers and older people, and those with disabilities.</i> • <i>A barren public realm dominated by parked cars and road access with little greenery. “</i> <p>“Transport for New Houses Project July 2018”, provides recommendations:</p> <p><i>“Build new housing in existing large urban areas, or in places that are close to, and well connected by public transport, walking and cycling.”</i></p>	
J Maycock		<p>My overriding comment is that this Local Plan consultation appears to assume that the proposals in the JSP, again with specific reference to the Churchill SDL, have been approved. Since the JSP has yet to be scrutinised by Inspectors, this Local Plan is misleading and confusing for lay members of the public. There are various serious issues in the JSP that need to be addressed, again with specific reference to Churchill.</p> <ul style="list-style-type: none"> • I find the ‘vision’ for MSGV to be deeply flawed with limited regard for the sustainability of such a location. It is entirely dependent on the construction of roads to support its development, at significant cost to taxpayers and all the attendant environmental impacts from pollution and habitat destruction, not to mention the permanent destruction of a unique and beautiful landscape. • It seems to be highly unlikely that the number of houses proposed can be developed within the area indicated – surely a density development and clearly not resembling a ‘Garden Village’ • The proposal adds a minimum of 5000 additional cars onto existing and already strained road networks, primarily M5 and A38, since the vast majority of residents in this location will inevitably only find work in Bristol. There is NO public transport facility now and it is very unlikely to be cost effective in the future. • Houses should be built near to the jobs in Bristol. MSGV is 15 miles from Bristol (the main source of employment) and 8 miles from Weston Super Mare – neither distance would enable people to cycle to work. • It is the least economically viable of all the SDLs in the JSP (BNP Paribas finding). 	
J Milward		<p>I object to the proposals for the Mendip Spring/Churchill Garden Village The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>In particular -</p> <ol style="list-style-type: none"> 1. Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) 2. Transport infrastructure is environmentally damaging 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> ◦ Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. ◦ Pollution - impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems. ◦ Landscape & biodiversity – are irrevocably damaged forever. <p>3. his Mendip Spring/Churchill SDL proposal from North Somerset Council is encouraging urban sprawl to leap-frog over Green Belt to create a soulless, dormitory town on good agricultural land. This does not constitute sustainable planning.</p>	
J N H Purvis		<p>I'm writing in reference to section 4.2 of the Local Plan, Mendip Spring Garden Village. As a resident of Churchill for 35 years I feel well qualified to comment.</p> <p>The proposal for a consultation for the Mendip Spring Garden Village cannot be justified as it stands. There are still significant issues that have yet to be addressed through the JSP process and you therefore cannot predict the outcome.</p> <p>The proposal to build 2800 in the Churchill Congersbury vale is ludicrous. If this is not obvious to you I will spell out the reasons:</p> <ol style="list-style-type: none"> 1. The area has little or no public transport Infrastructure 2. The traffic into and out of Bristol is already very congested. I thought it was a policy to reduce traffic pollution! 3. The main region for employment is over 15 miles away 4. The site is close to an area of outstanding natural beauty. 5. This development will completely change the rural character of the area with traditional villages loosing their identity as the urban sprawl takes hold. 6. Local infrastructure such as surgery's and schools are over subscribed. 7. There are other much more viable proposals than the Mendip Spring solution <p>As a result of all above I am completely opposed to the proposals put forward for the SDL of the Mendip Spring Garden village</p>	
J Simmons		<p>I wish to register that I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>Furthermore, the conclusions of the recent report by the Transport for New Homes Association are entirely relevant:</p> <p><i>“.... most new developments we have seen, particularly those built on large greenfield sites on the edges of towns, are designed for travel by cars. They have plentiful car parking, but limited or no access to public transport, limited facilities and services, and a lack of safe pedestrian or cycling routes to town centres or the surrounding area. The new ‘urban extensions’ and ‘garden villages’ by their very location away from large conurbations promote car-based living. This is a major issue of public policy.”</i></p> <p>The consequences of this approach, again as highlighted in this report, are:</p> <ul style="list-style-type: none"> • <i>Thousands of new journeys on the roads.</i> • <i>Undermining aspirations of active life styles, vibrant and less isolated communities.</i> • <i>People face longer commutes.</i> • <i>Lack of opportunities for those who don't drive, notably teenagers and older people, and those with disabilities.</i> • <i>A barren public realm dominated by parked cars and road access with little greenery.</i> • <i>Stimulating wider car-based sprawl.</i> 	

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		<p>Finally, their recommendations for what can be done:</p> <ul style="list-style-type: none"> • <i>Develop a national framework setting out where to build new homes, based on provision of sustainable transport, and aiming to meet economic, social and environmental needs.</i> • <i>Build new housing in existing large urban areas, or in places that are close to, and well connected by public transport, walking and cycling.</i> • <i>Plan land use and transport together. Local authorities must be able to work cross-boundary to analyse, design and fund public transport in tandem with the expansion of a whole area.</i> • <i>Invest urgently in urban and suburban public transport to serve expanding satellite towns and new suburbs. Where appropriate, fund trams and light rail as means to pull expanding areas together. Put serious money into capital and revenue support for bus infrastructure and services to enable the new residents to beat the traffic using the bus.</i> • <i>Use urban brownfield and regeneration sites. New urban quarters benefit from existing public transport networks and can be reached on foot and by cycle. Relate targets for new homes to the potential of redevelopment and brownfield sites.</i> • <i>Plan for higher densities but less area wasted on parking. Build modern apartments and town houses with wide appeal, including near stations, with shops underneath and leisure facilities on site. Take advantage of the enhanced viability of local businesses and public transport to improve the public realm. Curtail car parking to allow our planners to design more attractive places with more space for greenery and better public realm.</i> • <i>Look more closely at the lessons from Poundbury (the Dorset new town that is built at a human scale around walking, not cars, with employment and retail integrated into the walking environment).</i> <p><u>This report could have been written with the Mendip Spring development in mind.</u></p>	
J Sloyman		<p>As a Churchill resident of over thirty years, I have witnessed the low erosion of the integral nature and charm of a rural village. I have been affected by rapidly increasing congestion in the area, particularly on the A38 and I have been shocked by the worrying increase of flooding in the immediate area around my home (Jews Lane and A368 either side of the traffic lights). I am therefore totally opposed to the proposals for the SDL of Mendip Spring/ Churchill as I see these proposals resulting in escalation of existing significant problems and concerns.</p> <p>The Local Plan 2036 consultation for Mendip Spring/ Churchill is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the independent inspectors.</p>	
J Stickley		<p>I am unable to comment on the local plan as it prejudices the outcome of the Public Examination of the West of England Joint Spatial Plan (JSP) by the Independent Inspectors (now planned for after the May 2019 elections). Furthermore, it incorrectly assumes that Churchill/Mendip Spring New Town will go ahead. This assumption is wholly wrong. The JSP (to which so many of you responded in January 2018) feeds into the Local Plan, NOT the other way around.</p> <p>The basic principle of building the Churchill/Mendip Spring New Town has not been and may NEVER be approved because it is undeliverable, unsustainable and, as the West of England Authorities' own evidence demonstrates, Churchill/Mendip Spring New Dormitory Town will not provide affordable housing– the abnormal development costs will be high.</p> <p>This consultation is inappropriate and you cannot seek local comments on something that has not even been agreed yet.</p>	

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J Thompson		<p>I feel as though I have to comment on the proposed garden village near Churchill. If you want to ruin a nice rural area in one foul swoop this is the way to do it.</p> <p>No work in the locality, so bulldoze country side to build new roads to take the traffic to Bristol, all this when councils are trying to cut back on the amount of traffic entering built up areas. I know that there is land that can be used to build these houses right next to Bristol so alleviating any future traffic congestion.</p> <p>I and many other residents will fight against this very short sighted and ill thought out plan to save the countryside so that it can be enjoyed by future generations.</p>	
J. Lyndum Roberts		<p>I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The local plan 2036 consultation for Mendip Spring/Churchill Garden Village is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spacial Plan process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination of the independent inspectors.</p> <p>Houses should be built near jobs not 15 miles away. The traffic infrastructure to cope with this proposed development is not in place and will incur significant costs to improve.</p> <p>The pollution impact from a significant increase in traffic journeys will have a huge environmental effect.</p> <p>Approximately 350 houses are under construction in the Churchill/Langford area and the environmental impact from construction vehicles alone is significant and will be exacerbated by the construction of the so called Garden Village.</p> <p>The environmental issues associated with the construction of 4500 house energy is beyond comprehension.</p> <p>This ridiculous proposal should to be stopped. Common sense needs to prevail and the wild futuristic dreams of North Somerset Council cancelled.</p> <p>The proposal is inappropriate, unsustainable, unwanted and will cause irreversible damage.</p>	
Jan Murray	CALRAG	<p>We are 100% opposed to the SDL of Churchill/Mendip Spring 'Garden Village. To call it a 'Garden Village' when it will end up as a town almost the size of Wells is specious to say the least. There is overwhelming opposition to the proposal for Mendip Spring Garden Village SDL across a very broad demographic here in Churchill. Below are just some of the reasons why we object but by no means all.</p> <p>1. This consultation is premature and prejudices the outcome of the Public Examination (PE) by Independent Inspectors of the West of England Joint Spatial Plan.</p> <p>2. The Issues and Options document:</p> <p>2.1. Does not make it clear that the PE has yet to take place.</p> <p>2.2. Does not make it clear that there will be a full opportunity to comment on</p>	

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		<p>the draft Local Plan 2036 AFTER the PE Inspectors have reached their conclusions.</p>	
Jan Murray	CALRAG	<p>4. Ref 4.2 (page 42) Mendip Spring (Churchill) Garden Village</p> <p>4.1. North Somerset Council's own 'Sustainability Appraisal Scoping Report September 2018' acknowledges</p> <p>4.1.1. "Congestion continues to be an issue in North Somerset particularly around the motorway junctions and on key routes in urban areas. Many key corridors also go through more rural village communities, creating pinch points on the route which suffer from congestion particularly during peak hours. With significant housing and population growth, tackling congestion and supporting an employment-led approach will <i>become a major challenge for the council.</i></p> <p>4.1.1.1. Providing new major roads will not solve the problem of congestion in the rural villages which is already causing concern regarding local lanes.</p> <p>4.1.1.2. Building 2,800 houses will exacerbate an existing rural problem. No realistic solutions can be offered other than to build houses close to Bristol where there is an acknowledged need for employment-led housing.</p> <p>4.1.1.3. An 'employment-led approach' to house-building does make sense. Where is the local employment for the proposed SDL of Churchill/Mendip Spring? Bristol Airport will only create 300 FTE</p>	

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		<p>jobs by 2035. The extra jobs that have been so highly claimed will be zero hours or low skilled – not enough to support a mortgage and two cars per household which will be needed in a rural location. Thatchers' new factory planning application acknowledges that there will be no increase in number of employees.</p>	
JAshley	YACWAG	<p>I am opposed to the proposal for the Strategic Development Location, Mendip Spring/Churchill Garden Village. The local plan consultation (4.2) is premature. Significant issues have yet to be addressed through the Joint Spatial Plan process and formal examination. This proposed Strategic Development Location Mendip Springs/Churchill (garden Village) will destroy high grade agricultural land and do unjustifiable damage to the local wildlife habitat and environment. The proposed new transport infrastructure will be particularly damaging to the environment and create increased levels of pollution. New houses should be built close to existing transport infrastructure near Bristol at The Vale. North Somerset Council is proposing to create a dormitory town in the countryside adjacent to Mendip Hills Area of Outstanding Natural Beauty rather than build on 2% of North Somersets' Green Belt. All the adjacent authorities have proposals for development on green belt land.</p>	
Jennifer Bott		<p>Referring to section 4.2, page 42, Mendip Spring (Churchill Garden Village)</p> <p>I am writing to say that I am totally opposed to this proposed development, the building of nearly 3000 houses and supporting network of roads which would obliterate the most beautiful Somerset countryside and farmland of small fields and hedgerows which is, apart from its beauty, good agricultural land. This is adjacent to the Mendip Hills Area of Outstanding natural beauty and the development would cause huge environmental and ecological damage.</p> <p>The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint spatial plan process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the independent inspectors.</p> <p>Houses should be built closer to Bristol where the Metro bus can take people efficiently to their places of work in the city.</p> <p>The increased traffic from possibly 2,800 more families trying to get to Bristol from this area to work would be intolerable both in terms of traffic jams and air pollution.</p> <p>North Somerset Council is encouraging urban sprawl and create a soulless dormitory town on good agricultural land.</p> <p>The proposed area for development is more environmentally, ecologically and landscape sensitive than the green belt immediately south of Bristol and the development should not take place.</p>	

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jerb44		<p>This is a wildly optimistic presentation which could only be partially met if nobody had to travel to work. It completely ignores the enormous light pollution of the proposed numbers of houses on the Mendip AONB. It also ignores the noise and air pollution from the proposed new road which will inevitably generate further traffic flow towards Bristol, Bristol airport and Bath.</p>	
JLS		<p>The proposal at Mendip Spring does not meet the criteria of a garden Village. It is naïve to assume that it would function independently and would just become another dormitory housing estate. Houses should be built near to employment sources.</p>	
John Murray		<p>The proposed local plan consultation for the SDL of Churchill/Mendip Spring Garden Village (surely a "New Town"!) 2036 is completely out of order in that it is premature and pre-judges the outcome of the Public Examination of the Joint Spatial Plan.</p> <p>Please register my total opposition to the proposals for Churchill/Mendip Spring. The JSP should feed into the Local plan, not the other way around. The document even tells us that NSC is assuming that the outcome of the Public Examination of the JSP by independent examiners will be that the SDL of Churchill/Mendip Spring will be agreed. How can this be? How very misleading. Not even the might of North Somerset Council can prejudice the Independent Inspectors' decision.</p> <p>There are still very many significant issues to be addressed through the JSP ranging from the location of jobs through to road congestion and flooding which is already a problem with current new builds in the area. It is ill thought out planning to put a dormitory town which is far from efficient public transport, when there is a sensible alternative close to Bristol where people can walk and cycle to work, or use the metrobus. You really need to plan for healthy lifestyles that encourage cycling and walking not driving.</p> <p>Where are these new residents supposed to work and 'play'? The jobs at Bristol Airport are mainly poorly paid minimum wage or zero hours contracts. How can any of these people afford to buy a house here when they start at approx £350K for a two-bed semi.</p> <p>The cost of the infrastructure will be immense. Already the Crest Nicholson houses going up in Pudding Pie Lane are being advertised as, "perfect for commuting to Bristol". I thought that North Somerset were trying cut their carbon emissions.</p> <p>Please understand that I am not a NIMBY but we need the correct development in the correct place. You need to be protecting the one vital, cost-effective tourist attraction - the Mendip Hills AONB and the peace tranquility and ecology offered by Windmill Hill and the Mendip Hills.</p> <p>Your conceptual diagram also shows that the wonderful old holloway as you approach the village from Brinsea will be obliterated by a new road. Aren't you meant to be preserving the character of our villages?</p> <p>I could continue with many more reasons as to why this proposed development is in the wrong place but I am sure you now understand the depth of my despair concerning this ill founded and disastrous scheme.</p>	
Jonask		<p>I wish to make it known that I do not endorse in any way at all the Local Plan 2036 as it currently stands. It is an ill conceived document that shows scant regard for local residents, the effects on an already strained infrastructure and a complete disregard for the principles of the Green Belt.</p> <p>The proposal of 2800 homes in the Churchill/MendipSpring New Town is a complete waste of taxpayers money. It is also prejudging the outcome the public Examination by the independent inspectors. You are assuming, incorrectly, that this New Town will go ahead.</p> <p>I live in Upper Langford on the Bath Road less than a mile from the A38. My house, a listed property in the AONB is adjacent to the A368. The north end wall is slowly disintegrating from excessing vibrations due to, you the council allowing too many lorries beyond 7.5 tonnes to use this road which is already over</p>	

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		<p>subscribed. There are countless bottlenecks along the route that are becoming increasingly dangerous not leastly because there are no pavements for pedestrians. This road cannot sustain further increases in traffic if these plans go ahead.</p> <p>The same can be said of Stock Lane which is at bursting point.</p> <p>Jon King BS40 5DL</p>	
Jonathan		<p>This plan is flawed in a number of respects.</p> <p>Housing development in the middle of the countryside where most people will be working in Bristol or Weston is non sensical. They will need to commute on roads which cannot take the traffic. The polluting effect and damage to overall well-being of everyone affected will be immense.</p> <p>The airport expansion has already placed an intolerable burden on people who live in the country in North Somerset - this will be a bridge too far.</p> <p>Protect rather damage.</p>	
K and S		<p>We are totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors. We also object to spending public time and money before the outcome is known.</p> <p>We believe the new proposed housing at Churchill is misguided.</p> <p>Churchill lies at the foothills of an area of outstanding natural beauty. The proposed new housing will scar the landscape.</p> <p>Churchill is one of a very few pretty villages left with narrow lanes which have not unduly been spoilt by recent new builds. We believe the best option is to build alongside the new south link road at Bristol. Residents of new houses in this area will be able to (as the government encourage us ALL to do), walk, cycle, or use public transport to work.</p> <p>Residents of the new proposed housing at Churchill will have to travel to Bristol or Weston for employment. We are all very aware of environmental issues and should not be creating areas of new housing without the necessary infrastructure and spoiling a village.</p>	
K Avery		<p>I am writing conserving the propose development of a new town at Churchill and Langford</p> <p>referring to 4.2 p42 Mendip Spring Churchill Garden Village. Consultation</p> <p>I am opposed to this plan because it is not appropriate for North Somerset to conduct a consultation when very significant issues have not been addressed through the joint spatial Plan process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>The major issues are</p> <ol style="list-style-type: none"> 1. There is inadequate transport infrastructure and to provide this for a development so far out of Bristol would be both costly and environmentally damaging. Why would you build a new town where the resultant costs of providing access to the major employment areas would be so expensive. a dual Carriageway across the area would be devastating for wildlife and the quality of life for residents. It would need to pass over land which is less than 10 meters above sea level. with the effects of global warming and the potential rise in sea level this could be very damaging 	

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		<p>Much of this area is low lying land and subject to flooding and run off from the Mendip hills</p> <p>2. Current Roads are already at and beyond capacity with queues at road junctions resulting in pollution in the villages and damage to the quality of life.</p> <p>3, Mendip Hills AONB This is an environmentally sensitive area the new development would be within one mile and would destroy the area through light pollution and its visual impact. Also wild life and flora in this area need to be protected</p> <p>4. Green Belt. There is a large area of Green belt around Bristol which since the provision of the South Avon Link Road (which was built on green Belt Land) is in a more suitable position for development, thus mitigating the need for expensive infrastructure to transport workers from 15 miles away. Why is this land deemed to be of more value than prime agricultural land in North Somerset? This Green belt land is strangling Bristol. This area is already served by the Metro Bus residents could walk or cycle or use the bus to access work.</p> <p>5 Settlement Boundaries. Villages in North Somerset have an independent character. Settlement boundaries need to be preserved in order to prevent villages merging together. North Somerset Councils own Landscape Character Supplementary guidelines supports this view.</p>	
KMH1		<p>Should the strategic planning for North Somerset be guided by more sustainable principles, relating to community health and well-being? At the moment this feels like an afterthought. The list and questions above focus on a list of things, and not centred around people and their life.</p> <p>For example, retail, business, urban design, and transport connectivity are all well and good. But...Not enough is being considered from the point of view of existing people and new people for the area. How will people live healthy lives? How will the strategic plans address people front and center? Otherwise spatial planning will just focus on the fabric, or worse, a tick box approach by place makers to dump a locking castle type development on Churchill, Banwell and Nailsea. No soul, no imagination, Lego-land. We deserve better!!!</p> <p>Can the plans be honest about jobs/ growth in Weston and Clevedon? This is asked because without this, many many people will believe that all new householders in these homes will find jobs in Bristol. That could be 5000 to 10000 jobs/additional trips to/from work. Does NSC expect the enterprise zone to generate 5000 jobs? And will these jobs be of a premium to afford a £300-400k mortgage?</p>	
KMH1		<p>I am not in favour of this development on health, traffic and flood risk grounds. As a former Highways Agency and Defra employee with a strong experience in highway and flood management, and as an environmentally minded Chartered Civil Engineer, I need to point out a number of issues. I will leave it to the Parish Council and CALRAG representations to flag up wider sustainability issues. But for me, the proposals fall down because:</p>	

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		<p>1. There is no credible plan for growth in Weston and Clevedon that will divert or compete for jobs that will most probably go to Bristol. It means more trips in the am and pm peak to and from Bristol leading to traffic delays and increased air pollution in Bristol, on the A38, A370 and the passing villages. With Congresbury, Backwell and the Airport junctions already constrained, options to relief these constraints will be prohibitively expensive.</p> <p>2. There is no credible plan for dealing with flood risk at a strategic level. Additional urban footprint will increase runoff volumes and exacerbate and indeed increase the area of the flood plain. The northern edge is fed by springs. A high water table means that despite the occasional slopes in the development site to the north of Churchill, water will be directed quickly to an already stressed drainage system. SUDS and natural measures upstream might manage or slow some flows but a developer will not want suds implemented as it reduces housing density. Allied with the loose planning controls that we have seen with Langford Fields and the drainage issues there, I don't have high confidence that flood risk will be adequately managed, especially if adding in the longer term impacts of climate change. The housing density will need to reduce significantly to allow for the right kind of flood management measures.</p> <p>3. I am fundamentally opposed to the spur road from the A38/Bath-Weston junction to the proposed centre of the Mendip Spring town. Such a link road will destroy the social fabric that binds together Langford and Churchill, destroy the football and cricket clubs, and sever safe walking links between the two villages and to school. The enjoyment of accessing Windmill Hill and the surrounding landscape without traffic will also be heavily impacted. The SEA does not properly recognise these impacts. Such a link would not serve any proper purpose if the planned bypass is built, as links to the centre of the town can be made with the new bypass (not that I support a new bypass and development).</p>	
KMH1		<p>The proposals are in the wrong place, and the Ashton Vale needs to be considered instead. The Mendip Spring development will exacerbate traffic when commuting to/from Bristol, add heavily to air pollution along the A38 and A370 corridor, and increase flood risk to the nearby flood plain. Landscape will be impacted, especially from the views on top of the hill fort at Dolebury Warren. Finally, with so many hedge rows and wildlife corridors severed or removed, the impact on wildlife will be huge.</p>	
L Greenwood		<p>I wish to express my concerns and my opposition to the proposed development above. Like most Churchill residents, I moved into the village for sanctuary, not to live next door to Brookside. Having witnessed the traffic problems, crime incidents and social carnage that the Portishead re-development has caused over the last decade I cannot image the follow-on issues that this ill-conceived project will affect this sleepy backwater.</p> <p>There are no jobs, few amenities and precious little public transport offerings for this proposed increase in local population (another 6,000 plus?) so I can only assume the required use of private vehicle transport will increase beyond the capacity of the incumbent road system. The counter-argument that the introduction of new ring roads will alleviate this is flawed; ring roads only convey people in and out of the area, not de-clutter existing byways.</p>	
Lesley Hegarty		<p>The Local Plan consultation (which includes this Issues and Options consultation) is premature. NSC cannot conduct a proper consultation when very significant issues have yet to be addressed through the JSP process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination in this manner. Carrying out these consultations would require multiple participants to presume the JSP Inspectors' findings which are at least 12 months away from being concluded and published.</p> <p>North Somerset Council are well aware of the widespread and vehement objections to the Garden Village at Churchill and Langford submitted through the JSP consultations to date. The summary of issues provided at section 4.2 of the Issues and Options consultation is a wholly inadequate representation of the welter of detailed comments submitted to the JSP and therefore misleading. The impression is conveyed of the Garden Village being the only alternative. No alternatives are presented. The JSP Inspectors have identified a failure by North Somerset Council to consult at all on the choice of Strategic Development Locations. If this Consultation purports to be such a consultation on the SDLs, it fails to identify itself as such and is wholly inadequate as such.</p>	

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		<p>There are a plethora of consultations running at the same time which is very confusing. The Issues and Options consultation is an utter waste of public waste of ratepayers money and yet again North Somerset Council will take little no notice of ratepayers' vehement objection to the Mendip Spring Garden Village which will be found to be unsound at the JSP examination in 2019.</p> <p>I summarise my fundamental objections to the Garden Village at Churchill and Langford on the following grounds:</p> <ul style="list-style-type: none"> • Location distant from main employment locations • Increase in car movements • Infrastructure costs • Environmental and ecological damage • Flooding and drainage issues • Proximity to AONB • Landscape • Available alternatives • Sustainability • Deliverability <p>Subject to my fundamental objection to this consultation, I set out in the table below detailed comments on specific questions.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>In planning terms the proposed vision is misconceived by reason of the following:</p> <p>(a) It is undeliverable because: (i) It will not be possible to purchase the necessary land to carry out the development within the time contemplated by the plan and (ii) is dependent on the construction of roads from the M5 motorway requiring government funding which is unlikely in the absence of there being any sound economic case for it.</p> <p>(b) It is not viable because the cost of the necessary infrastructure to support such a large development in the middle of the countryside would be disproportionate and prohibitively high and would made the building of affordable housing in Churchill unviable .</p> <p>(c) It is unsound because(i) There is and will not be sufficient local employment to support the new development (ii) There will be no adequate public transport infrastructure to support the development in consequence of which many more journeys will be made by car in to Bristol (2011 Census Churchill and Lanford - 87% of those who travel to work commute to Bristol.*) (iii) The cost of necessary flood and drainage infrastructure wil preclude the provision of affordable housing.(iv) it is adjacent to the The Mendip Hills AONB.</p> <p>(d) It is unsustainable because the location is too far from employment locations resulting in increased car movement , the lack of an adequate transport infrastructure, the unmitigatable damage to ecology and landscape, and substantial increase in pollution from traffic commuting into and out of Bristol(a City which aspires to be carbon neutral)</p> <p>In summary, the Mendip Spring Garden Village proposal (7.6 of the JSP) will be found to be unsound on public examination due to take place in 2019. The vision for this development is therefore fundamentally flawed.</p> </div>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Local Access Forum	Local Access Forum	The document talks of new walking and cycle paths; the LAF makes the same comment that these should become multi-user, and on the same grounds. The new pathways also particularly need here to be linked to the good network of footpaths and bridleways on the Mendips, and also to the north towards Congresbury and Langford. At present, vulnerable users, are forced onto roads that are already dangerous. A particular difficulty is the B3133 Congresbury to Langford road, carrying far too much heavy traffic already and hazardous to drive, let alone walk, cycle or ride. Another benefit of doing this would be improved facilities for tourism, whatever one's chosen method of transport.	
LyndaB6		Is North Somerset Council really prepared to sacrifice to main reason why people choose to live in rural villages by encouraging urban sprawl near to the Mednip Hill AONB with the villages merging, countless more cars on the road commuting to jobs in Bristol and all the resulting pollution caused. Surely the sensible solution would be to site new developments on the South Bristol link road area where there are better transport links into the city.	
M Abbott		<p>I am totally opposed to the plan on the following grounds.</p> <p>Mendip Spring (Churchill) Garden Village-2,800 houses</p> <p>Houses should be built next to jobs in Bristol. Mendip Spring/Churchill is 15 miles from Bristol, which is the main source of employment and yet North Somerset Council is attempting to create a soulless dormitory town on valuable agricultural land. The result would be a catastrophic and permanent eyesore.</p> <p>The increased use of cars will place an unsupportable strain on existing transport infrastructure-to say nothing of appalling traffic pollution and the risk it brings to the health of local people. Their health and well-being is not considered at all.</p> <p>This development is not progress but plain and simple destruction.</p>	M.Abbott.pdf (99 KB)
M Avery		<p>I am opposed to this plan because it is not appropriate for North Somerset to conduct a consultation when very significant issues have not been addressed through the joint spatial Plan process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>The major issues are</p> <ol style="list-style-type: none"> 1. There is inadequate transport infrastructure and to provide this for a development so far out of Bristol would be both costly and environmentally damaging. Why would you build a new town where the resultant costs of providing access to the major employment areas would be so expensive. a dual Carriageway across the area would be devastating for wildlife and the quality of life for residents. It would need to pass over land which is less than 10 meters above sea level. with the effects of global warming and the potential rise in sea level this could be very damaging Much of this area is low lying land and subject to flooding and run off from the Mendip hills 2. Current Roads are already at and beyond capacity with queues at road junctions resulting in pollution in the villages and damage to the quality of life. 3, Mendip Hills AONB this is and environmentally sensitive area the new development would be within one mile and would destroy the area through light pollution and its visual impact. Also wild life and flora in this area need to be protected 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>4. Green Belt.</p> <p>There is a large area of Green belt around Bristol which since the provision of the South Avon Link Road (which was built on green Belt Land) is in a more suitable position for development, thus mitigating the need for expensive infrastructure to transport workers from 15 miles away. Why is this land deemed to be of more value than prime agricultural land in North Somerset? This Green belt land is strangling Bristol. This area is already served by the Metro Bus residents could walk or cycle or use the buss to access work.</p>	
M Hodson		<p>Generally:</p> <p>our area simply lacks the transport infrastructure and amenities necessary to support even 500 more homes, let alone the 2,800 apparently proposed.</p> <p>The proposed new Dual Carriageway will merely make existing traffic problems on local roads (especially the A38 in rush hour) worse, because it feeds into them at its ends.</p> <p>Ladymead Lane will (unless you make it one way as part of the development) become a short cut/ rat run, to local detriment.</p> <p>There are insufficient shops, petrol stations, social facilities, etc.</p> <p>BT say that our slow internet is due to contention issues already: so even the ADSL lines are apparently already saturated.</p> <p>From the sewage problems we've had on Ladymead Lane, I dare hazard that even the area's sewer capacity is inadequate.</p> <p>I can certainly state that the Police will not be able to cope with the new area's crimes. New Towns are notorious for having problems with youth crime in particular, especially when there are very restricted social facilities. It's not as if there is anything much for under 18s to do in the evening around here.</p> <p>This area suffers from regular pluvial flooding and, if climate change science is to be believed, this will only get worse as extreme weather conditions become more the norm. We are on the downhill side of the Mendips and. when rain blows in from the West, we see extremes of relief rain. If these houses were to be built, they'd have to be on stilts: in the Dutch manner.</p> <p>Additionally: there is every sign than the housing market is about to crash. The Government Help to Buy scheme will not last much longer (not past Brexit). These houses will be pretty much unsaleable. Especially as the developers have the laughable belief that an 'affordable home' can cost well over £200,000. Having seen the serried ranks of houses outside Dublin, built under just such a scheme as this and never occupied thanks to the financial crisis (and now vandalised by thieves taking the pipework and cables): we don't want a ghost estate such as this might well become in North Somerset.</p> <p>Personally:</p> <p>We moved to Langford from South London. We came here to be in a quieter, more pastoral location, with a good sense of community. We were diligent in checking that nothing remotely like this new town was (then) planned. If it had been, we'd not have come here.</p> <p>Bringing 2,800x2.4 incomers to the area in a very short space of time, rather than by organic growth, will ruin Churchill, Sandford, Ladymead ... and probably Congresbury, etc.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
M Lee		We are totally opposed to the gross over development in an inappropriate area. We fully agree with all the points made against it by CALRAG.	
M Parry		<p>I wish to register my objections to the proposed Mendip Spring (Churchill) Garden Village. My reasons for objecting are summarised below.</p> <p>1 There is very little logical reasoning in its location . There is surely an over- riding necessity to maintain as much agricultural land as possible.</p> <p>The need to be as self sufficient as possible in these turbulent times is self evident. We cannot rely on the easy transport of comestibles from foreign countries as we do now. The issues of global warming and its threat to the planet cannot and should not be ignored, You surely have a duty to preserve as much fertile land as possible for the future generations. The area which you are contemplating covering with concrete should not even be considered when there are brown field sites available.</p> <p>2 The Council appears to value the so- called Green Belt on the outskirts of Bristol as sacrosanct. Yet they have failed to give any convincing reasons for maintaining</p> <p>their obdurate defence of the land which has already been invaded by developments such as:</p> <p>The new South Bristol Link Road</p> <p>The extension of car parking for Bristol Airport</p> <p>There is sufficient land in this area to accommodate all the housing that North Somerset Council needs to satisfy the Government's demands.</p> <p>The site is ideal for the people who will be employed in Bristol, there are opportunities here to build houses which will be suitable for the people who will be employed in Bristol. The infrastructure is already there with good roads and public transport available so easily.</p> <p>3 The proximity of this proposed development to the Mendip Hills is of great concern. The planning inspectors who have been involved in recent public inquiries in this area</p> <p>of N- Somerset have high lighted the importance of maintaining the landscape. The Mendip Hills should not be violated by by this development when the area of ' Green Belt '</p> <p>south of Bristol is available.</p> <p>I trust that common sense will prevail and that this thoughtless desecration will not be pursued.</p>	
M Richmond		I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village is premature and thus far sadly lacking in any case officer response. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have to be addressed through the Joint Spacial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the independent assessor to whom I have made my representations.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The concept of building houses away from transport links and jobs is alien. The site is 15miles from Bristol and 9 miles from Weston Super Mare with a transport infrastructure that is already overwhelmed, in particular during morning and evening peaks. Small increases render the traffic infrastructure unusable and not fit for purpose. That is if the weather is dry. Should it rain then the roads around Churchill already flood most notably Church Lane and Brinsea Batch and throughout Langford.</p> <p>40 percent of land in North Somerset is Green Belt and 2 percent is needed to build this volume of houses. Logic would say build these houses near to transport links and jobs rather than in the isolated rural retreat of Mendip Spring and Churchill. Creating a dormitory town in the Countryside adjacent to the AONB of the Mendip hills is an ecological and environmental time bomb. The most sensitive of sites and one that would be permanent and impossible to mitigate against.</p> <p>The boundaries that NSC state are to be rigorously maintained to avoid Somerset villages merging seems to have been ignored in the proposals and with the size of the Garden Village and its proximity to Banwell, Churchill and Langford. Three that will be joined if plans progress. Preserving the character and landscape of individual villages is impossible in this case. As a resident less than 50m from the proposed boundaries with no consultation (despite my best efforts to get an explanation) I fail to see how the landscape and character of this part of Churchill will be maintained.</p> <p>The JSP is not legally compliant and has not followed planning policies most directly in its woeful consultation with the local community, its lack of notification, no evidence of environmental impact analysis and therefore it cannot be justified as its not based on any credible evidence base. It is a shot in the dark with fingers crossed with regards Churchill and surrounding areas for NSC planners.</p> <p>The planning policy side of this objection is functional, the emotive side is fundamentally a breach of good local authority representation. This village and others are suffering from intense stress and strain over this issue. Many residents are struggling and fearful, many are deteriorating and lose the will to fight, many can see the homes they cherish ruined and there environment decimated. Elected members and officers should encourage welfare and regrettably there is non.</p>	
M Short		<p>My comments were already made in my response to the original JSP consultation. The summary below is my comment on the Issues and Options document.</p> <p>I believe this consultation to be inappropriate as the JSP has not been passed by the Planning Inspectors. The SDL selected for the proposed garden village of Mendip Spring remains completely unsustainable no matter how many options NSC have suggested.</p> <p>The fact that no alternative to this, and the Banwell proposal, has been put forward, is very concerning given that one exists, supported by many. NSC must demonstrate it has carefully reviewed its Green Belt policy before it can dismiss the Vale.</p>	
M Whittington		<p>I am emailing to submit my objections to the West of England Joint Spatial Plan and in particular the ‘Garden Village’, proposed for Windmill Hill, Churchill. My reasons are:</p> <ol style="list-style-type: none"> 1) North Somerset needs affordable homes. Building more 3 and 4 bedroomed houses will not address this need or give priority to local residents. 2) Building a collection of houses in a rural area does not create a ‘village’ as the residents will need to drive everywhere, for work, shopping, entertainment etc. There are few bus services in rural areas. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>3) The proposed development would be in a rural area with only very limited employment opportunities, any new resident would most likely have to commute to work.</p> <p>4) The proposed development will add to the existing, at times awful, traffic congestion at commuting times, especially on the A370 and A38. Existing congestion is already due to increase with the new housing developments currently underway.</p> <p>5) The need for any new residents to drive everywhere will simply add to pollution levels, an issue currently of concern to the Government.</p> <p>6) The Mendip Hills are an AONB and currently benefits from tourism. Every effort should be made to preserve the Mendip Hills and the surrounding areas for future generations.</p> <p>7) I did look at the consultation questionnaire with a view to completing it, but found that it made premature assumptions and did not appear to present alternatives, such as building houses nearer to Bristol with its employment opportunities and public transport systems.</p>	
Maitland-Round		<p>I Strongly oppose the proposed SLD of Mendip Spring/Churchill.</p> <p>Surely the Joint spatial Plan should finish it's formal process of examination before North Somerset Council consult about this.</p> <p>A town of this size at the foot of the Mendip Hills, an Area of Outstanding Natural Beauty, is quite out of keeping with maintaining the rural nature of our local communities. Infrastructure is inadequate to cope with the increase of traffic and services needed. Our local planning officers need to be much more joined up and broad in the approach to these kinds of plans and make proper provision for sustainable and environmentally sound development. Just another dormitory town is not good enough.</p> <p>The whole 'Green belt' issue should be reconsidered as only 2% of it would needed to build 4,500 houses, close to Bristol where jobs are.</p> <p>We could learn a lot from other countries about public transport provision and environmental protection so we can all enjoy the areas we live in.</p> <p>Please listen to your local people and stand up for us and the lovely places we live in.</p>	
Margaret Munro		<p>This consultation is inappropriate as it presupposes the outcome of the JSP examination by the independent inspectors.</p> <p>Churchill is the wrong place for this kind of development. It is most unlikely that sufficient employment for the proposed new population will materialise in the immediate area. Plans for major new roads are in fact an admission of car dependency and that the majority of employment <i>will be located away from new housing</i> i.e. in Bristol and Weston. The scheme will have an adverse effect on the landscape of Mendip ANOB.</p>	
Mark Beach		<p>I am totally opposed to the proposals for the SDL of Churchill/Mendip Spring. Further, this consultation should not be taking place before the JSP has been examined independently and the very considerable opposition to this plan has been given a hearing. North Somerset Council are acting prematurely in seeking to discuss this proposal before the JSP Public examination has taken place and in so doing they are attempting to prejudice the outcome and are potentially wasting council funds. I have submitted my comments to the JSP on the 9th January 2018 and I re-iterate my views below:</p> <p>? It is clear that this scheme would create a dormitory town along the new carriageway with the majority of these residents commuting to Bristol as there are very few employment opportunities available locally and the council has not delivered plans which will create the necessary 5000+ jobs. Further, this proposed development appears to directly contravene NPPF (2012) policy.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>? It is my understanding through the BNP Paribas report that there is no reasonable prospect of the Churchill Strategic Development Location (SDL) being at all viable within the JSP plan period.</p> <p>? The Churchill development is unlikely to offer much, if any, affordable housing due to the high development costs.</p> <p>? The proposed site is completely unsuitable for building due to the frequent flooding which occurs in Churchill, Langford and Sandford. A situation which will only be worsened by any adjacent building.</p> <p>? Wessex Water have stated that the local sewerage network is at, or over, capacity. Localised sewer flooding is a common event. The network cannot be economically enhanced. ANY further building will increase the problems of foul water flooding, a frequent event in Langford. ANY further building will increase the instances of discharging sewerage waste into the brooks, again a common occurrence due to the inability of the sewerage system to cope.</p> <p>? This is clearly a case of development in the wrong place. There is an existing proposal to build 4,500 houses by the South Bristol Link road (The Vale, North Somerset), conveniently located near Bristol with jobs, cycle and walking access, bus services, as well as the new Metrobus. Building at The Vale would utilise only 2% of the green belt. Building at Churchill would mean building in an environmentally sensitive area which would be clearly visible from the Mendip Hills and would destroy the character of the villages of Churchill and Langford permanently.</p> <p>? The local road network into Bristol is already overwhelmed, adding a further 3000 cars is only going to add to this problem. Walking and cycling are not feasible alternatives. Successive attempts to provide a viable bus service locally have all failed as the route is too long to attract sufficient usage.</p> <p>? The proposed motorway junction (21A) is less than 3km from junction 21 at St Georges, questioning the need for this access point as well as noting the majority of the traffic for Bristol airport is from the north side, further a New Underground metro to the airport from Bristol City is envisaged within the next 10 years.</p> <p>In conclusion North Somerset Council seems to be solely interested in pushing through an ill-considered development at Churchill.</p>	
Mark Funnell, Planning Adviser, National Trust	National Trust	<p>The National Trust owns the land of Dolebury Warren SSSI and scheduled monument in the Mendip Hills (a site which is managed by Avon Wildlife Trust).</p> <p>In our comments on the Joint Spatial Plan publication document in January 2018, we stated our concerns that “the scale of new housing and associated road infrastructure in this location [Banwell and Churchill] would adversely affect the views and setting of the Mendip Hills AONB”. We therefore agree that one of the critical issues is the impact on the Mendip Hills AONB, particularly in relation to the scale of development being proposed. As well as landscape and visual impacts, any potential ecological impacts should also be taken into account.</p>	
Mendip Hills AONB unit	Mendip Hills AONB Partnership	<p>The Banwell and Churchill SDLs (strategic allocations) are still to be tested through the Joint Spatial Plan examination. As set out in our comments dated 8 January 2018 to the Joint Spatial Plan consultation, we have strong concerns regarding the proposed allocation of Banwell and Churchill garden villages</p>	
Michael Norman		<p>There is a desperate need for affordable housing, and in North Somerset it is crucial that such housing should be located close to centres where employment is available, such as Bristol or Weston Super Mare (despite wildly optimistic assessments, it is most likely that employment opportunities at Bristol Airport will be decreasing in future). Transport infrastructure is already inadequate in the area, and increased usage of cars would put extra strain on the system as well as increasing pollution. I am strongly opposed to the proposals for the SDL. The local Plan consultation is premature.</p>	
moore@		<p>It is inappropriate for the council to be consulting further on these proposals when there are significant issues that have been raised via the JSP consultation, which is still with the Independent Inspector. Within that I also specifically object to any proposal to create a "Green Village" at Churchill, as there is no way to create a sustainable and economically viable new settlement at this site.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
moore@		<p>It is inappropriate for the council to be consulting further on these proposals when there are significant issues that have been raised via the JSP consultation, which is still with the Independent Inspector. Within that I also specifically object to any proposal to create a "Green Village" at Churchill, as there is no way to create a sustainable and economically viable new settlement at this site.</p>	
Mr and Mrs Lait		<p>I am writing on behalf of my husband and I to express our total opposition to the above proposed development.</p> <p>In particular we note that the proposal states 'location lies outside the Green Belt and floodplain north of the Mendip Hills'. We actually live in that general direction and in the 20 or so years we have been here this area has flooded very badly on at least 3 occasions, 2 of which were in 2012. The whole area is prone to flooding which with climate change is only going to get worse in the future and building this development can only make this more likely.</p> <p>This proposal would be built very near to the Mendip Hills, an AONB. Why damage the surrounding countryside and character of the local villages on non-green belt land to avoid building on 2% of green belt nearer to Bristol with all the advantages that would bring to the new residents.</p> <p>The commute to Bristol would entail a 30-mile round trip - this journey already can take over two hours at rush hour - what would it be like with so many more cars needing to travel.</p> <p>This proposal would be the thin end of the wedge with the whole of this area becoming a dormitory town for commuting to Bristol.</p> <p>With regard to Question 15: The vision states it will be a thriving community. This is at the expense of the existing communities. E.g. The Doctors' Surgeries are already operating at full capacity and all entail a car journey.</p> <p>It states it will provide a quality environment for people with access to a strategic road network. This implies the increased use of cars which will not be good for the environment with increased pollution and usage of fuel.</p> <p>It is hoped that when this proposal comes up for further discussion these objections will be taken into account.</p>	
Mr S McNulty		<p>I am writing to object to the proposal for a Garden Village of approximately 2800 houses, to be built off Honey Hall Lane near Churchill, North Somerset.</p> <p>A summary of my rationale for opposing this proposed development is as follows:</p> <p><u>-Scale of the project:</u> The proposed development is far too large for the area. It will create strain on the local resources, including but not limited to medical facilities and schooling, and there is insufficient amenities to support the development. It is not in keeping with the surrounding area.</p> <p><u>-Transport:</u> Transport links to the proposed development are not adequate to support the proposed development.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p><u>-Congestion</u>: The proposed development will result in severe traffic congestion at times on the A 38, A 370 and the Brinsea Road. There are already significant issues in that regard--this will only add thereto. Commuters will need to use B3133 which is not adequate for this increased traffic. Air pollution will increase, and there would likely be increased traffic accidents.</p> <p><u>-Sustainability</u> - There are no local jobs for persons acquiring these properties, meaning they would primarily be sold to commuters travelling to Bristol for work. It makes much greater sense to go with the other proposal, which would see this development situated on the outskirts of Bristol.</p> <p><u>The Countryside destroyed (forever)</u>: This area is situate in the North Somerset countryside, an area of beauty to be enjoyed. It should not be subject to this level of housing development, which is not in keeping with the area.</p> <p>North Somerset Council's Consultation proposals for the SDL of Mendip Spring/Churchill Garden Village is premature. There are significant issues which should first be considered. In addition, consultations should be conducted regarding the feasibility of these houses being constructed prior to local amenities being developed to support the increased population.</p>	
Mrs A Love		<p>Having recently attended a presentation about the proposal from North Somerset for the SDL of Mendip Spring/Churchill, I now write to express my objection of as much as I can understand of the plan.</p> <p>I am horrified to think that anyone can think that a village can be created from 'scratch' and 'dumped' in the middle of good agricultural land. Villages evolve over many years and consist of long term residents who have been in the area for varying numbers of years and helped to create much of the community into which newcomers can join. A totally 'newly created village' will have no history and just be a collection of houses but no community.</p> <p>I cannot believe a project as big as this could be proposed in an area with so little supporting infrastructure. (I write this a few hours after another accident between Junction 20 and 21 on the M5 with the subsequent surrounding 'A' roads gridlocked)</p> <p>The surrounding roads are already struggling with the amount of traffic now and although a dual carriageway is suggested, traffic travelling south towards Blagdon/Bath or Cheddar/Wedmore/Wells would be using the existing country routes.</p> <p>Traffic traveling north via the MS/6 would travel through Congresbury to the A370 and onwards to the M5 at the A370/M5 Junction 21, or via Yatton to the M5 Junction 20 at Clevedon. (Or the latter route just to visit Clevedon itself). (It would not I am sure use the proposed dual carriageway to the A38, travel through Bristol to the M32/M4 and then west to join the M5!).</p> <p>I understand it is hoped traffic intending to travel south down the M5 would use the new dual carriageway/Banwell bypass to join the M5 just outside Banwell at a new junction. Is money assured for this? Otherwise that traffic will also have to travel through Congresbury to the A370 to Junction 21, or across country to the A38 and down to Junction 22 at Edithmead.</p> <p>The whole surrounding road infrastructure seems destined to be inundated by increased traffic one way or another.</p> <p>The traffic situation through Yatton is already a major safety issue and any thoughts of a bypass to ease this situation seem to have evaporated. This I have understood from discussions involving the proposed new Medical Centre at Smallway, Congresbury.</p> <p>Although I see there is a proposal for a new Medical Facility to serve the Garden Villages, we are constantly hearing/reading about the difficulty of recruiting GP's to country areas. Where are these GP's going to come from. The distance from the major hospitals/facilities is prohibitive from their point of view, especially as it seems Weston General Hospital is cutting back on services. Which also means Taunton, Bristol and Southmead Hospitals are already dealing with extra patients. Are there plans to increase the Ambulance/Emergency services in the area? Are the existing hospitals going to be able to cater for the extra workload? This will be across the whole age range from Maternity, Paediatric, and Geriatric Care including long term chronic illnesses, acute care and acute/chronic Mental Health Care.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>I don't understand all the intricacies of the JSP process but it seems these proposals for the Mendip Springs/Churchill Garden Village have appeared out of nowhere before any in depth consultation and seems to assume the outcome.</p> <p>I read recently about the Taylor Wimpy application to build 'The Vale' on Green Belt just south of Bristol. I also understand that changes to the GB are not impossible and that in fact some GB areas have already been developed eg. South Bristol Link Road, Bristol Airport, and more recently it's Silver Zone Car Park. Surely developing an area that would accommodate 4,500 homes, just outside the City with already existing road infrastructure in place and easier access to Bristol, a major source of employment, would mean much less road congestion and pollution. It's a very small % of Nth. Somerset's total GB.</p> <p>As youngsters we picked Cowslips in the low lying fields around Ladymead Farm and scrumped Morgan Sweet Apples from the nearby orchard! To think that these productive and nature rich areas can be totally swallowed up by such a huge expanse of houses seems unacceptable. There will be no chance to readdress the damage to the area once done.</p> <p>The residents will have great difficulty, because of the estates size and situation, in integrating with the surrounding villages and any attempt by them to do so will increase traffic problems everywhere. People will have to use vehicles to travel between villages whether for business or pleasure. And that doesn't take account of service/delivery vehicles either. The minor roads between villages in this area have long since been unsafe for pedestrians let alone with the increase in traffic movement this development will lead to.</p>	
Mrs E Marsh		<p>I cannot help but be opposed to the proposed Mendip Spring (Churchill) Garden Village, even though I fully realise the need for new housing in this area for local people, especially young people trying to get on the housing ladder and mature people like myself who would like to downsize, but still stay local.</p> <p>This proposal will destroy a beautiful area and when it is gone it can never be brought back. Who on earth would want to buy a house in an area where you would have to travel on gridlocked roads to get to work and in your spare time wonder where the lovely countryside is gone.</p> <p>Please take a good long look at the alternative site at Ashton, right next to the major employment area of Bristol. Greenbelt is not set in stone and other neighbouring local authorities are considering using it rather than sacrificing green fields.</p> <p>I do not want North Somerset to be polluted, smoggy county just because the council were too timid to even consider looking at the alternative.</p>	Mrs E Marsh.pdf (22 KB)
Mrs F Snoxall		<p>I am quite accepting of the need for new housing, but the right size (and cost) of house in the most suitable place. The proposals for the Mendip Spring (Churchill) Garden Village will be in the most unsuitable place imaginable. It is obvious that there is minimal employment in the area and people will just add more cars to the A38, A370 and surrounding smaller lanes to travel to Bristol.</p> <p>The traffic situation in North Somerset is now at breaking point, highly unsafe and heavily polluting. This proposal will add thousands more cars and their exhausts to an unaddressed problem.</p> <p>Please consider the suggested site at Ashton, ideally placed next to the new link road and the Metro Bus. This excellent service is so under used that free journeys have recently been offered and I thoroughly enjoyed mine. The bland excuse that it is green belt is rather lame considering the alternative of building over good agriculture land and an area of AONB.</p>	Mrs F Snoxall.pdf (22 KB)
Ms Casson		<p>I am a resident of Congresbury living just off the A370, which gets increasing busy and most cars ignoring speed limits. The 30 mile limit sign near the strawberry line is not emphasised like it is at other entrances to the village. The roads need to be improved if we are to have all the houses proposed. I am also totally opposed to the proposals for SDL at Mendip Spring/Churchill Garden Village. There are no suitable roads in the area, and are extremely busy round Churchill senior school. I drive to</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Sandford each day and can see the growth of more and more houses. These are small villages with little in the way of facilities and means yet more traffic to get to Weston or Bristol for shopping.</p> <p>I feel houses should be built nearer to Bristol and the South Bristol Link Road, perfect areas for commuting. The new bus services can be further developed and houses near to bus routes should encourage people to leave their cars at home for the short commute.</p> <p>Also the Mendip Hills are AONB and will be damaged by developments at Mendip Spring/Churchill Village.</p> <p>We need to preserve our villages.</p>	
MSD		<p>I am against the proposal for a number of reasons. The sheer number of houses can not be supported by the proposed infrastructure. There isn't the employment opportunities locally for the houses which would mean commuting. There aren't sufficient public bus links for this. A far better proposal is to build south Bristol where the metro has been built, there is access to a train station which in itself opens employment possibilities more so across England.</p> <p>I am totally against the proposal.</p>	
N Cooper	Claverham Future	<p>This is just as bad as Banwell GV, It is so poorly conceived and seemingly driven by a need to compete with Bristol plus an inability to work against party dogma (swap out green belt land)</p>	
N Green		<p><i>"I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors." ALSO</i></p> <p>Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) Transport infrastructure is environmentally damaging.</p> <ul style="list-style-type: none"> • Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. • Pollution - impact of a significant increase in car journeys to and from Bristol where there are already very significant air quality problems. 	
N Low		<p>I would like it known that I completely disagree with this development and every aspect of it.</p> <p>This development of high density 3 and 4 storey buildings is completely out of character with the local vernacular. It would mean an increase of 5000+ commuters each way daily into Bristol. During the last 5 years traffic congestion on the roads to and from Bristol have become so much worse. With long traffic jams and an increase in accidents. Pinch points at the airport, Yatton and Congresbury are already struggling with the amount of traffic. We have a meager public transport system of buses which are infrequent and do not run at times that would support people working in Bristol. The service to Weston has almost completely gone now.</p> <p>Nearly 300 houses are already being built in this area in addition to the 2800 suggested in the dormitory town. But even in the existing developments the affordable housing may not even be built as it relies on the sale of the larger housing which is not selling well. Therefore Local people are not being helped at all.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The West of England Authorities' own evidence demonstrates that Churchill/Mendip Spring New Town cannot provide affordable housing due to abnormal development costs.</p> <p>This area does not have the infrastructure to support a new town e.g. schools, doctors, transport.</p> <p>There is no local employment, people will work in Bristol adding to traffic, congestion and pollution.</p> <p>The impact on our local ecology would be irreversible. Damage to Mendip Hill AONB and Windmill Hill such precious countryside needs to be preserved for future generations.</p> <p>However, there is a better sustainable alternative by building close to jobs and infrastructure. Surely anyone with any sense can see that building near to existing jobs and infrastructure would mean people could cycle and use public transport to get to work. They would have shorter and cheaper commutes. Affordable housing could be incorporated due to lower development costs.</p> <p>Please listen to the people who live hear and know the difficulties first hand. This development would be a disastrous mistake.</p>	
Natalie Ward		<p>For the record, I am totally against the plans for the Mendip Spring Garden Village. The strength of feeling against this development is extremely high for a number of justifiable reasons.</p> <p>With reference to Q 4.2 at p 42</p> <ul style="list-style-type: none"> Your proposals to consult are completely premature. The JSP and its very significant issues have yet to be addressed and formally examined by independent inspectors, so it seems to me to be wholly inappropriate to spend time and tax payers' money attempting to consult on issues that are merely predictions or assumptions at this stage. <p>In addition:</p> <p>I continue to be very concerned about the density of housing proposed for development within the proposed Mendip Spring Garden Village, when the main source of employment is likely to be Bristol, some 15 miles away. A development of this size would be better supported in the environs of that source of employment, and infrastructure, i.e. Bristol.</p> <p>The infrastructure around Churchill could not possibly support an additional 2,800 houses or circa 5,000 cars. This will put a strain on existing transport networks, and even if better transport links were introduced, it's likely that most people would still wish to drive their cars into Bristol. The roads around Churchill are small, country lanes, mostly without pavements, and are already congested at peak times. The commute into Bristol at peak times in the morning is an hour – this can only increase with a greater volume of cars on the roads. It is optimistic to think that more than a very few people will walk or cycle to work.</p> <p>The increased car usage will be environmentally damaging and cause significant air quality problems.</p>	
P & M Matthews		<p>You will probably not want to receive these comments on your latest consultation about the 2036 proposals. Basically you are still assuming that the developments on a huge scale will go ahead in the Churchill/Banwell area and all of your questions take this as the base.</p> <p>I strongly disagree with this assumption and think it is absolute madness to add over 5,000 houses to a location 18 miles from where the bulk of the residents will have their jobs. The provision of a road to get some of them more speedily to the A38 south of the airport will only scratch the surface of the infrastructure needed to get them (and the current commuters) to work in Bristol. I travel in regularly for 9.00 am meetings and already have to leave at 7.30 am to get there on time. The new</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>section of ring road is already log-jammed from the A370 back up to the roundabout on the A38 at that time. Add another 5,000 cars, at least, to this and there will be chaos.</p> <p>You have not listened, and the clear answer is to have the additional housing much closer to Bristol where public transport and other route options exist. This may mean taking some of the green belt away, but this could be offset by extending green belt designation in other parts of North Somerset - especially close to the Mendip Area of Outstanding Natural Beauty.</p> <p>I am hopeful that the JSP examination will address this point and reject your overall conclusions. You are wrong.</p>	
P Chedgy		<p>Strongly opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for the Proposed Development is premature. It is inappropriate for North Somerset Council (NSC) to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan (JSP) process and formal examination. It is wrong to predict, presuppose or anticipate the outcome of the JSP examination by the Independent Inspectors.</p>	
P Knight		<p>I wish to register my total opposition to the proposals for the SDL of Mendip Spring/Churchill. The local plan 2036 consultation for Mendip Spring/Churchill Garden Village is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan process and formal examination. It is wrong to predict or pre-suppose the outcome of the JSP examination by the inspectors.</p> <p>I feel very strongly about the following issues:</p> <ul style="list-style-type: none"> • Houses need to be built near to the jobs in Bristol. • The huge numbers of homes being built in the surrounding villages (e.g. Cheddar, Winscombe, Sandford, Wrington) as well as increased volumes of traffic to Bristol airport will mean that traffic down the A38 towards Bristol will be unmanageable. Already significant holdups are occurring near to the airport. • Increased pollution and environmental damage will be caused by increase in commuter numbers • No alternative transport options other than by road have been proposed. • No employment provision or prospects near to the proposed new town <p>Greenbelt</p> <p>The suggested site at Ashton Vale is far more suitable and the argument that it is greenbelt and therefore cannot be built on needs to be challenged. Other authorities have proposals to build on greenbelt and North Somerset have already allowed development on greenbelt at the airport as well as the new South Bristol link road.</p> <ul style="list-style-type: none"> • Greenbelt could be reallocated if the development goes ahead at Ashton Vale • North Somerset Council is encouraging Urban Sprawl to create dormitory towns <p>I am aware of the need for more housing but do hope North Somerset Council will take into account residents concerns and seriously consider the much more suitable site at Ashton Vale.</p>	
P Parker		<p>I am writing to OBJECT to the inclusion within the Plan of 4.2 Mendip Spring Garden Village. This inclusion is premature as the Joint Spatial Plan has yet to be determined.</p> <p>The location of the Garden Village (or more accurately given its size "New Town") is inconsistent with the policies of the JSP and is contrary to the aim to enhance landscape and be in a sustainable location. It is quite the opposite on both counts.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The obvious alternative site is Ashton Vale with its proximity to Bristol with excellent public transport links and potential for active travel opportunities (I cannot see too many walking or cycling to Bristol from Mendip Spring New Town). The landscape in the Ashton Vale area is already encroached and degraded by the new Bristol Ring Road.</p> <p>The only possible objection to Ashton Vale is its location within the Bristol Green Belt. However the JSP within its preamble acknowledges that to achieve housing targets some encroachment into Green Belt will be required. So why not at Ashton Vale where the Bristol Green Belt has already been breached by the Ring Road?</p> <p>The Green Belt is an anachronism that is long overdue to be reviewed, and now is the time. I cannot see why NSC would defend the Bristol Green Belt on its outer borders for the sole benefit of Bristol but to the detriment of ruining a much loved area within the very heart of the County, and identified purely on the artifice that it conveniently lies within a gap to the immediate South of the Green Belt and North of the Mendip AONB. It has been identified purely based on examining lines on a 2 Dimensional Planning boundary map. And little else. It is very lazy and ill-considered thinking. The landscape value remains of greater value than those that would be artificially preserved.</p> <p>I trust that this idea can be removed until such time as the JSP has been concluded and NSC puts its efforts into identifying and supporting the alternative Ashton Vale site in the JSP.</p>	
Parish Councils Airport Association	Parish Councils Airport Association	<p>The PCAA's only comment is that the housing in both the Banwell and Mendip Spring Garden Villages will lead to a considerable increase in traffic on the A38. Most people will be commuting to and from Bristol. This means that the commuters will have to travel past Bristol Airport. There will be increased congestion on the A38 and gridlock at the South Bristol Link roundabout. This will lead to commuters finding alternative routes on rural lanes and the A370.</p> <p>The PCAA support a light rail to the airport or mass transit to the airport subject to the project being environmentally sustainable and not harmful to other residents along the route. Access to the light rail and mass transit should be available to commuters from elsewhere such as the Chew Valley. We question, however, how the mass transit and the light rail will avoid impacting the green belt and the timing of delivery.</p>	
Peter English		<p>The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan process and formal examination. It is completely wrong to predict or presuppose the outcome of the JSP examination by the independent inspectors.</p> <p>The Proposal, if implemented, would place a considerable extra load on an already stretched and overloaded road system. It would also add greatly to local air pollution.</p> <p>Most people living in North Somerset work in or close to Bristol. Housing should be placed close to Bristol where those travelling can take advantage of the various public transport systems. This is a model adopted by other councils around Bristol.</p> <p>The Green Belt around Bristol is not sacrosanct. The new South Bristol Link Road is on Green Belt as is Bristol Airport and associated hotel and parking schemes.</p> <p>The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty. This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol.</p> <p>Settlement boundaries need to be rigorously maintained to avoid North Somerset villages merging together. This philosophy is encompassed in North Somerset Council's own Landscape Character Supplementary Guidelines. In proposing this development the Council is working against its own policy guidelines.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Peter Revington		<p>I write once again with regard to the proposals for the development of the Churchill area.</p> <p>I remain totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>Furthermore, the proposals seem to pay scant regard to the paucity of local infrastructure, the impact upon sensitivity of a rural community, its environment and the wishes of the existing population who have little appetite for the development of a Bristolian suburb on their doorstep.</p> <p>Those proposals that I have seen would impose a degree of development in an area without employment sufficient to avoid the need for commuting for a significant number of the residents; despite the proposed expansion of the airport. It seems inevitable that the majority of the incoming souls will seek employment other than in the immediate vicinity, thereby adding to the pressure on transport infrastructure.</p> <p>Churchill is immediately adjacent to an area of outstanding natural beauty. Although not so designated itself, its proximity to such an unspoilt area makes it rich in a range of uncommon species such as bats, newts and butterflies which are increasingly threatened, and which can only suffer from this type of ribbon development.</p> <p>I therefore urge you to revisit and reject these proposals.</p>	
Philip Duke		<p>This proposal in reality is a dormitory for Bristol and would do almost nothing for North Somerset. Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment).</p> <p>It would be morally wrong and a betrayal of the adjacent population to sacrifice North Somerset Green Belt to preserve that of Bristol. There is low grade Bristol Green Belt land ready for this type of development; and there is precedent for its use, such as the Airport and its car parks and the new Southern Link. This is the obvious and appropriate location</p> <p>Already, the main link to Bristol (A38) is inadequate and has numerous non-improvable chokes to traffic, and these affect myself. The most local to the proposal is at Churchill Gate where traffic queues frequently reach back half a mile. Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure.</p> <p>Pollution - the impact of a significant increase in car journeys to and from Bristol would affect the existing and new populations and those of Bristol where there is a very significant air quality problems.</p>	
PPC Bristol	PPC Bristol	Please, think very carefully about building 2800 houses in our lovely villages.	
Professor G R Pearson		<p>I am completely opposed to this proposed SDL for 2800 houses, about half of it on land within Congresbury's Parish boundary. It is premature to have a public consultation when so much in the JSP has still to be decided, and a formal examination conducted.</p> <p>Houses should be built near the main area of employment, Bristol, thus reducing the number and length of car journeys made by commuters. It is unlikely that the site would ever support more than a few jobs. Public transport in the area is currently inadequate, and there are no proposals to increase it.</p> <p>There are doubts about the viability of the proposed development, and whether the Affordable Housing quota would be delivered.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Professor G R Pearson		It is imperative to maintain distinct villages, avoiding housing development on green fields in the countryside. The villages near this proposed 'Garden Village' are already suffering from these. Please register my objection to the proposed Mendip Spring Garden Village.	
R Gosling & G Bennett		<p>We strongly object to the Mendip Spring/Churchill Garden Village proposal on the following grounds:-</p> <ol style="list-style-type: none"> 1. Due to limited availability of work in the area, it will automatically bring more cars and burden already busy roads, as the majority of work will be in Bristol. 2. The Mendips and surrounding area is of outstanding beauty and once destroyed, lost forever. 3. The obvious location is off the new road joining the A38 to 370 at Long Ashton, where land nearer to Bristol already has the necessary infrastructure to absorb more people, which would sacrifice approximately 2% of greenbelt and save the Mendip Hills area. 4. In our opinion political and council members are only in office for a limited period and therefore just custodians of our land and countryside. Do they really have the right and clear conscience to destroy our heritage against our wishes of the majority of long standing inhabitants? 	
R&S Chadwick		<p>We are strongly opposed to the proposals of the above Plan 2036. We itemise our objections as follows:-</p> <p>a) there is a lack of employment opportunities in the area and as a consequence there will be an increase in car traffic as people need to drive to their main source of employment. The whole area already has significant problems with large volumes of traffic causing delays, traffic jams etc and occasionally accidents.</p> <p>b) environment - there should be efforts to reduce damaging CO2 pollution by North Somerset Council, not increasing the problem.</p> <p>c) agricultural land is a valuable resource which should be protected for future generations and to build on this land is illogical.</p> <p>d) Mendip Hills is an AONB and this proposed development is adjacent to the Mendip Hills. Areas of Outstanding Natural Beauty should be safeguarded without question.</p>	
RA Hyde		I am writing to voice my concern that due process is not being followed when consulting on the 2036 local plan. Specifically, the consultation for Mendip Spring Garden Village (4.2) should not be taking place whilst the examination of the JSP by the independent inspectors is underway. The outcome of this examination should feed into the review of plans for Mendip Spring Garden Village, but this is not possible until the independent inspectors have reported. I'm surprised that NSC hasn't delayed the consultation, and am concerned that the council may be prejudging the outcome. I look forward to your response.	
Robert Coles		The SDL for Mendip Spring/Churchill is insane: it puts thousands of houses in the wrong part of North Somerset; it destroys one of the nicest bits of rural landscape we have; there are no jobs there so people will be travelling to Bristol or Weston putting thousands of extra vehicles onto already overcrowded roads, increasing air pollution, wasting hours in traffic queues, increasing anxiety levels and generally making everyone feel shit. So stop it. Go build it outside of Bristol or down on the levels where it can't be seen because I expect the standard of design and build will be as depressingly mediocre as the rest of the developments North Somerset allows. Better still, encourage a life-style where people live, work, learn and socialise on a local level and stop this insanity of using the car.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Robin Lea	Mr	<p>I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed</p> <p>A completely ridiculous scheme.</p> <p>No local employment</p> <p>No suitable road network</p> <p>Massive cost of building roads</p> <p>Pollution from increased traffic/commuting</p> <p>unacceptable damage to open country</p> <p>Perfectly located site at The Vale at a fraction of the cost</p> <p>The Vale is where young people want to be</p>	
Roger Key		<p>1. Strategic Development Locations</p> <ol style="list-style-type: none"> 1. The I&OD includes four areas for development that are described as Strategic Development Locations (SDLs). Given the forecast population growth in the WoE and in North Somerset, I am not against the proposals for some large development sites, as they can deliver the required infrastructure in terms of local amenities. However, I do object to the proposed sites at Nailsea and Churchill/Mendip Spring. 2. Of the SDLs included in the I&OD, I can see that Banwell and Backwell may have their merits. Banwell is close enough to Weston-super-Mare for new residents to travel to work in Weston by cycling or new public transport services. Meanwhile, Banwell village has long needed a bypass and construction of new houses will contribute to the cost of its construction. (I am not convinced that the additional houses should be located north of the proposed bypass but that matter is for a later stage of plan making. Backwell is well served for non-car travel by train and by regular bus services along the A370. So I can see the case for modest growth of Backwell too. 3. In contrast, I am completely opposed to the proposed SDL of 2675 dwellings with employment land at Churchill/Mendip Spring because the site is simply too isolated and too far from the employment centres of both Bristol and Weston-super-Mare. There is little prospect of providing a frequent bus service to attract travellers away from their cars to these destinations. So residents working in those locations will be forced to travel by car adding to traffic on the routes to the west and north, including both the A370 and the A38. The A38 to the north of Bristol Airport already needs improvement (even before the airport applies to expand its passenger limits). The A370, with several villages straddling the road between Congresbury and Flax Bourton, is not capable of carrying significant growth in traffic without harming those settlements through declining air quality, noise, vibration, severance and an increased risk of accidents. 4. I also have concerns about the allocation of an SDL for 2575 dwellings with employment land, within the Plan period, located to the south-west of Nailsea. Here, I can see that there may be scope for some development but the location appears to me to be on the “wrong side” of Nailsea, as it’s too remote from the town centre. It seems to me that it would be better to concentrate development at Nailsea on the north and north-east side, where it would be closer to and easier to integrate with the existing town. Extensive development to the south-west would also concentrate development traffic on the A370. Even with the suggested transport mitigation package, the JSP Transport Topic Paper (Update) WED007 predicts increases of traffic of several hundred vehicles in the AM peak, which is probably beyond the capacity of the existing road. Allocating land to the north and north-east would channel additional traffic onto the B3130, where it would impact on far fewer residents. 	
S Ashman		<p><i>I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill.</i></p> <ul style="list-style-type: none"> • It would make much more sense for Houses should be built near to the jobs in Bristol. • Transport infrastructure is environmentally damaging. <ul style="list-style-type: none"> ◦ Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. ◦ Pollution - impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems already. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>40% of land in North Somerset is Green Belt. Just 2% is needed to build 4,500 houses close to the jobs in Bristol. Surely this is a much better and green solution.</p> <p>The Green Belt is strangling Bristol. It is not sacrosanct/untouchable.</p> <p>The new South Bristol Link road is on Green Belt. Bristol airport is on Green Belt North Somerset Council (October 2018) granted planning permission for a temporary extension to the Silver Zone car park on Green Belt at Bristol airport. Rather than build on 2% of North Somerset's Green Belt NSC would rather create a dormitory town in the countryside adjacent to the Mendip Hills AONB.</p> <p>North Somerset Council is encouraging urban sprawl to leap-frog over Green Belt to create a soulless, dormitory town on good agricultural land. All the adjacent Local Authorities have proposals for development on green belt.</p> <p>It is possible to reallocate this 2% of Green Belt.</p> <p>This proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty (AONB). This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol.</p> <p>The environmental/ecological damage would be permanent - impossible to mitigate against.</p> <p>Settlement Boundaries need to be rigorously maintained to avoid North Somerset villages merging together.</p> <p>To preserve the character and landscape of individual villages. North Somerset Council's own Landscape Character Supplementary guidelines supports this view.</p> <p>People should be encouraged to walk or cycle to work. It is not possible to walk or cycle to the airport, Bristol or W-S-M.</p> <p>In sincere hope common sense will prevail</p>	
S Aumayer		<p>I am opposed to the proposals for the SDL of Churchill/Mendip spring. The local plan 2036 consultation for Mendip Spring Garden Village (4.2) is premature. It is not appropriate for the council to conduct a consultation when very significant issues have yet to be addressed through the JSP process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the independent inspectors.</p>	
S Hibberd		<p>It is stated that "The purpose of the Issues & Options document is to identify the issues which need to be addressed and to receive initial feedback on a range of proposed alternatives." What alternatives are considered to the planned developments? There don't seem to be any. The time, effort and expense put into producing this document is unlikely to be rewarded as it is based on a Joint Spatial Plan not due to be ruled on till summer 2019 and which has no guarantee of acceptance. The number of hurdles listed in the Next Steps section of I&O before the Local Plan can be determined is daunting. Even more so as the whole thrust of the document hangs on a positive reception of the JSP.</p> <p><u>Responses to questions 15 to 18</u></p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The SDL closest to my home is "Mendip Spring". If built it will have a major negative effect on the local area. Adding another 2,800 homes to the 300 already being constructed will raise the number of homes from the current 850 to nearing 4,000. None of the Options put forward seem to address the real issue. It is not sensible to place small dormitory towns in open countryside where there is limited infrastructure and few employment opportunities!</p> <p>There is increasing concern nationally and locally about road congestion and associated pollution; commuting 15 miles to work by car (most likely in Bristol) will surely be the natural choice as public transport is almost non-existent along the A38. The negative effect on link roads that are already badly congested, like the B3133 to Congresbury, will be impossible to overcome. Junctions at the Ship and Castle and Smallway are already overloaded.</p> <p>Bristol, whether North Somerset Council leaders like it or not, will provide jobs - as it does at present for many thousands of existing commuters from North Somerset. Promised improvements in public transport will prove impractical and too costly.</p> <p>The idea of constructing a dual carriageway by-pass around Sandford and Churchill to deal with increased traffic congestion is surely a pipe dream. If the projected cost of a Banwell by-pass has already risen to £55 million, how would a road at least 4 times as long be funded?</p>	
S Moore		<p>The proposal and "vision" for Mendip Spring seem simplistic and naive and overlook the significant issues around lack of sustainable transport links and employment as well as the impact on the AONB and rural communities. This would create a soulless dormitory town and significantly add to pollution and congestion. Development should focus on sites closer to existing cities and towns. It is also inappropriate to be continuing to solicit feedback on these vague plans when the verdict of the Independent Inspectors on the JSP as a whole is not yet known.</p>	
S Moore		<p>The proposal to build 2,675 houses at Churchill ("Mendip Spring") is totally inappropriate and unsustainable. It fails to meet the council or the wider JSP stated objectives around sustainable, economically viable communities - adding to rather than solving the traffic issues in the area and putting an unacceptable strain on existing communities and amenities. Why is the council still pursuing this "Garden Village" option (as detailed in 4.2), when sites closer to Bristol have apparently been "ruled out"? Why also are the council putting this out to further consultation when the JSP is still with the Independent Inspectorate? Significant issues and objections have been raised via that process, and have not yet been addressed.</p>	
S Parker		<p>I refer to 4.2 Mendip Spring(Churchill) Garden Village and would like to object to the proposals for the Garden village at Churchill. The Local Plan consultation is premature as the Joint Spatial plan is not yet determined.</p> <p>I feel that this is an unacceptable development in lovely rural countryside that has its own wildlife which would be greatly affected by this development.</p> <p>It would also add to the evermounting pollution in this area which is increasing considerably with the amount of extra traffic.</p> <p>I feel that Ashton Vale alternative option would a much better choice, more sustainable than the Garden Village in Churchill. It is closer to the city & with better transport links & better prospect for employment.</p>	
SCT1967		<p>I am completely opposed to the strategic locations for housing on this scale in Churchill, Banwell and Backwell. There are no significant new employment opportunities in these areas so as a consequence additional housing will hugely increase the number of commuters travelling from North Somerset to Bristol, and there is no plan to upgrade existing transport infrastructure to carry this commuter traffic from North Somerset to Bristol. Current road travel times into Bristol at rush hour are up to 90 mins from Churchill to Bristol along the A38, and similar from Congresbury to Bristol along the A370. Train infrastructure is already at breaking point with insufficient provision for the number of commuter travellers, as well as there already being insufficient parking at the two main railway stations at Yatton and</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Nailsea/Backwell to accommodate commuters from outlying villages. North Somerset Council should be building on Ashton Vale and areas closer to Bristol which could be served with existing infrastructure.</p>	
Simon		<p>I believe the plan proposed is not in the best interests of the communities. You are essentially recommending destroying villages and turning this area into a massive commuter belt therefore making the traffic into Bristol even worse. This seems madness when there is open space closer to Bristol that will far reduce journey times. Why would you want to destroy the countryside and the villages of Churchill, Banwell, Langford, Backwell and Nailsea town? The council should be focused on using the land sensibly and providing adequate airport links. Stock lane in Langford is a narrow road and often blocked by lorries yet already you have sanctioned the building of many more houses in Langford. I know people will object because they don't want things to change where they live but this goes way beyond that. It actually doesn't make sense and you are creating a greater traffic and social problem with the plan proposed. You really need to reconsider the impacts of what you are proposing and the way that you are doing it.</p>	
Simon Hegarty		<p>The Local Plan consultation (which includes this Issues and Options consultation) is premature. NSC cannot conduct a proper consultation when very significant issues have yet to be addressed through the JSP process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination in this manner. Carrying out these consultations would require multiple participants to presume the JSP Inspectors' findings which are at least 12 months away from being concluded and published.</p> <p>North Somerset Council are well aware of the widespread and vehement objections to the Garden Village at Churchill and Langford submitted through the JSP consultations to date. The summary of issues provided at section 4.2 of the Issues and Options consultation is a wholly inadequate representation of the welter of detailed comments submitted to the JSP and therefore misleading. The impression is conveyed of the Garden Village being the only alternative. No alternatives are presented. The JSP Inspectors have identified a failure by North Somerset Council to consult at all on the choice of Strategic Development Locations. If this Consultation purports to be such a consultation on the SDLs, it fails to identify itself as such and is wholly inadequate as such.</p> <p>There are a plethora of consultations running at the same time which is very confusing. The Issues and Options consultation is an utter waste of public waste of ratepayers money and yet again North Somerset Council will take little no notice of ratepayers' vehement objection to the Mendip Spring Garden Village which will be found to be unsound at the JSP examination in 2019.</p> <p>I summarise my fundamental objections to the Garden Village at Churchill and Langford on the following grounds:</p> <ul style="list-style-type: none"> • Location distant from main employment locations • Increase in car movements • Infrastructure costs • Environmental and ecological damage • Flooding and drainage issues • Proximity to AONB • Landscape • Available alternatives • Sustainability • Deliverability <p>Subject to my fundamental objection to this consultation, I set out detailed comments on specific questions.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>In planning terms the proposed vision is misconceived by reason of the following:</p> </div>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>(a) It is undeliverable because: (i) It will not be possible to purchase the necessary land to carry out the development within the time contemplated by the plan and (ii) is dependent on the construction of roads from the M5 motorway requiring government funding which is unlikely in the absence of there being any sound economic case for it.</p> <p>(b) It is not viable because the cost of the necessary infrastructure to support such a large development in the middle of the countryside would be disproportionate and prohibitively high and would made the building of affordable housing in Churchill unviable .</p> <p>(c) It is unsound because(i) There is and will not be sufficient local employment to support the new development (ii) There will be no adequate public transport infrastructure to support the development in consequence of which many more journeys will be made by car in to Bristol (2011 Census Churchill and Lanford - 87% of those who travel to work commute to Bristol.*) (iii) The cost of necessary flood and drainage infrastructure wil preclude the provision of affordable housing.(iv) it is adjacent to the The Mendip Hills AONB.</p> <p>(d) It is unsustainable because the location is too far from employment locations resulting in increased car movement , the lack of an adequate transport infrastructure, the unmitigatable damage to ecology and landscape, and substantial increase in pollution from traffic commuting into and out of Bristol(a City which aspires to be carbon neutral)</p> <p>In summary, the Mendip Spring Garden Village proposal (7.6 of the JSP) will be found to be unsound on public examination due to take place in 2019. The vision for this development is therefore fundamentally flawed.</p>	
Stewart Johns		<p>specific points:</p> <ul style="list-style-type: none"> • Several thousand houses in Churchill/Langford needs several thousand jobs. Even theoretically, where are those jobs coming from? • The lower end of Langford is a giant container for water coming down from the hillsides. How on earth are you going to stop this flooding? • In Churchill, under current primary school rules I assume the new residents will have immediate priority on the overcrowded school places. Where are the current residents children going to go to school? Are you building new schools ready for the new residents? I think I read that there are on average 1.1 school age children per average house. Where are the 1000's of new children in Churchill going to go? • I notice no affordable housing in the houses already being built. What proportion in Churchill is affordable? • Currently much housing in Langford is rented by students. When the new houses are complete I believe some people are intending to buy to let. Where do you envisage these students will go to? and what happens to the current rented housing? • The sewage system in Langford is at breaking point at the moment so what is in place to increase capacity? and where will it go? • Stock Lane has literally already become impassable for much of the day so how will it cope with the new volumes of traffic? It is the only way to Yatton Train station. • Ladymead Lane is now often impassable and the residents (quite rightly) are going to stop drivers using their private drives as pull ins. How is this going to be resolved? 	

Respondent Name	Respondent Organisation	Comment	Attached documents
Stowey Sutton Parish Council		<p>The PCAA's only comment is that the housing in both the Banwell and Mendip Spring Garden Villages will lead to a considerable increase in traffic on the A38. Most people will be commuting to and from Bristol. This means that the commuters will have to travel past Bristol Airport. There will be increased congestion on the A38 and gridlock at the South Bristol Link roundabout. This will lead to commuters finding alternative routes on rural lanes and the A370.</p> <p>Stowey Sutton Parish Council support a light rail to the airport or mass transit to the airport subject to the project being environmentally sustainable and not harmful to other residents along the route. Access to the light rail and mass transit should be available to commuters from elsewhere such as the Chew Valley. We question, however, how the mass transit and the light rail will avoid impacting the green belt and the timing of delivery.</p>	
sue.knight@madasafish.com		<p>Referring to 4.2(p.42) Mendip Spring (Churchill) Garden Village Questions 15-18</p> <p>I wish to register my total opposition to the proposals for the SDL of Mendip Spring/Churchill. The local plan 2036 consultation for Mendip Spring/Churchill Garden Village is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan process and formal examination. It is wrong to predict or pre-suppose the outcome of the JSP examination by the inspectors.</p> <p>I feel very strongly about the following issues:</p> <ul style="list-style-type: none"> • Houses need to be built near to the jobs in Bristol. • The huge numbers of homes being built in the surrounding villages (e.g. Cheddar, Winscombe, Sandford, Wrington) as well as increased volumes of traffic to Bristol airport will mean that traffic down the A38 towards Bristol will be unmanageable. Already significant holdups are occurring near to the airport. • Increased pollution and environmental damage will be caused by increase in commuter numbers • No alternative transport options other than by road have been proposed. • No employment provision or prospects near to the proposed new town <p>Greenbelt</p> <p>The suggested site at Ashton Vale is far more suitable and the argument that it is greenbelt and therefore cannot be built on needs to be challenged. Other authorities have proposals to build on greenbelt and North Somerset have already allowed development on greenbelt at the airport as well as the new South Bristol link road.</p> <p>Greenbelt could be reallocated if the development goes ahead at Ashton Va</p> <p>North Somerset Council is encouraging Urban Sprawl to create dormitory towns</p> <p>I am aware of the need for more housing but do hope North Somerset Council will take into account residents concerns and seriously consider the much more suitable site at Ashton Vale.</p>	
Susan	Mrs	<p>I am totally opposed to this proposal. This proposed development is NOT a garden village rather, with 2,675 dwellings, it is a small town and, as such, will have considerable negative impact upon already existing communities such as Congresbury which is immediately adjacent. Employment for the majority of new residents will be in Bristol and the increased traffic from this new "village," even with the proposed bypass, will impede flow on a network that is already severely congested. This increase in traffic will lead to a significant increase in pollution and subsequent deterioration in air quality, which will be especially noticeable during the rush hour at village junctions which are already at a stand still at this time. I accept that many new homes are needed for a growing population, but the proposed location of this new "village" is inappropriate. It should be built on The Vale, from where many residents would have the option to walk or cycle to work in Bristol and where a bypass is already built, rather than 15 miles away where there is very little employment.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
T Smith		<i>Myself and my wife are totally opposed to the proposals for the Strategic Development Location of Churchill/Mendip Spring. The Local Plan consultation for Mendip Spring Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan process and formal public examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</i>	
T Snoxall		<p>I recently attended a meeting at which plans for the Mendip Spring (Churchill) Garden Village were displayed.</p> <p>Having studied the plans I was shocked and horrified to realise that such a development was ever seriously considered by North Somerset Council (NSC).</p> <p>Should this development be approved by the independent inspectors, and I trust they have yet to give their verdict, although NSC appears to be assuming approval will be given but have no reason for this assumption as far as we the public are aware.</p> <p>If the inspectors do give approval then they are accepting that the existing roads are adequate for the increased traffic that will result. It is crystal clear to anyone but the most most myopic that this is not the case and the result will be gridlock on the A38.</p> <p>It is essential and sensible for new development of any size to be constructed near to the area of employment, in this case Bristol. To deliberately cause the enviable problems of pollution and poor air quality by building miles away from employment is perverse.</p> <p>There is an easy solution to the demands for housing being made by Central Government by NSC. Namely, to use the land which already contains the new South Bristol Link Road.</p> <p>The refusal to consider the obvious solution that it is green belt is pathetic. Is it really the NSC view that it is preferable to destroy agricultural land and create dormitory settlements adjacent to AONB land. The green belt has been breached many times and with no great ill effect. To use the land available and where I believe planning has already been outlined is such an obvious solution it beggars belief that it is not used.</p> <p>To use the "green belt land" would additionally provide NSC substantial additional income from the council tax accruing from the development as the development whist bordering Bristol is in North Somerset.</p>	
Terry Harrold		<p>"I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors." ALSO</p> <p>Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment)</p> <p>Transport infrastructure is environmentally damaging.</p> <p>Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure.</p> <p>Pollution - impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems.</p>	
Terry Harrold		<p>40% of land in North Somerset is Green Belt. Just 2% is needed to build 4,500 houses close to the jobs in Bristol.</p> <p>The Green Belt is strangling Bristol. It is not sacrosanct/untouchable.</p> <p>The new South Bristol Link road is on Green Belt.</p> <p>Bristol airport is on Green Belt</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>North Somerset Council (October 2018) granted planning permission for a temporary extension to the Silver Zone car park on Green Belt at Bristol airport.</p> <p>Rather than build on 2% of North Somerset's Green Belt NSC would rather create a dormitory town in the countryside adjacent to the Mendip Hills AONB.</p> <p>North Somerset Council is encouraging urban sprawl to leap-frog over Green Belt to create a soulless, dormitory town on good agricultural land.</p> <p>All the adjacent Local Authorities have proposals for development on green belt.</p> <p>It is possible to reallocate this 2% of Green Belt.</p>	
Terry Harrold		<p>The proposed Mendip Spring/Churchill development is adjacent to the Mendip Hills Area of Outstanding Natural Beauty (AONB). This area is more environmentally, ecologically and landscape-sensitive than the Green Belt immediately south of Bristol.</p> <p>The environmental/ecological damage would be permanent - impossible to mitigate against.</p>	
Tom Leimdorfer		<p>This is an ill-conceived proposal in a totally unsuitable and unsustainable location. It is as remote as can be in existing centres of employment with no prospect of generating new employment other than that for servicing the community. The cost of providing the required infrastructure is prohibitive and likely to be well above current estimates. The chances of delivering significant proportion of affordable housing is low. The negative impacts on rural landscape, and the high levels of out-commuting should rule out these proposals on the basic principles of our current Core Strategy. The proposed number of dwellings for the area assume a large density in what will be a town centre. This 'garden village' will have a population double the size of the town of Castle Cary (including adjoining Ansford). Nearby villages like Langford, Churchill and Sandford would become suburbs in a town with a total population similar to Wells. There is no rationale to justify placing such a large out-commuting population in this location.</p>	
Tom Rawlins		<p>I am writing to object to the Local Plan 2036. I am completely against it and below I have set out just a few of my reasons. This is a terrible plan that has not been thought through properly and does not take into account all the different factors. This should not go forward.</p> <p>Referring to 4.2 (p42)Questions 15-18 Mendip Spring (Churchill) Garden Village</p> <p>I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. I agree with CALRAG's statement that it is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</p> <p>I think that :</p> <ul style="list-style-type: none"> • houses should definitely be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) • Transport infrastructure is environmentally damaging and the Banwell bypass built in isolation will have a hugely detrimental affect on all the villages beyond. Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. The impact of a significant increase in car journeys to and from Bristol will pose a very significant increase in air pollution where there are already air quality problems. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
Viv Tomkinson	Congresbury Residents Association Group	It is wrong for NSC to be undertaking this consultation in advance of the public examination of the JSP. It is not known whether the JSP will be judged to be sound, but this Issues and Options document patently is predicated on the assumption that the SDLs will be judged to be sound. I fervently hope and indeed believe that this will not be the case. The document itself acknowledges that significant objections were raised through the devious consultation - if consultation is to be meaningful NSC should have amended it's proposal to take account of these objections. But NSC has clearly failed to do so and instead states that the principle of development in this location will be addressed through the JSP. This further reinforces the point that this consultation should have been deferred pending the outcome of the JSP examination.	
W Humm		I am totally opposed to the proposals for the SDL of Churchill/Mendip Spring. The Local Plan 2036 consultation for Mendip Spring Garden Village, (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the independent inspectors.	
WENP	West of England Nature Partnership	As above, we suggest the vision better incorporates high quality green infrastructure at all scales. For example, including opportunities for people to enjoy living natural spaces – both in the public realm but also weaving through individual developments (ref Building with Nature benchmark).	
Winscombe and Sandford Parish Council	Winscombe and Sandford Parish Council	It is considered that more viable and sustainable options for a new garden village exist closer to Bristol and these should be explored in preference to the Mendip Spring Garden Village.	
Wrington Parish Council	Wrington Parish Council	The proposal is ambitious but will change the whole of this predominantly agricultural landscape beyond recognition and will devalue the area's appeal to new residents and existing ones alike. It is completely out of scale with the local vernacular and will overwhelm local schools and other facilities. Transport facilities are not fit for purpose and the plan will lead to further traffic congestion with the vast majority of new residents commuting to Bristol for employment. Consideration must also be given to the protection of PROWs extant in the proposed development area. The proposal is not sustainable in planning terms and will impact adversely on traffic congestion and climate changing emissions.	
Wrington Parish Council	Wrington Parish Council	The proposals for a 'garden village' at Mendip Spring are premature and considered unsustainable. Until the JSP formal examination process has been concluded however, further consultation is only at best hypothetical and may be unachievable.	
Wrington Village Alliance		key issue missing from the developing principles is how a sustainable transport provision can be made to avoid so much use of the private vehicle. in the "Transport" section of Issues and Options, the importance is noted of offering greater travel choice. This needs considering in the context of MSGV in the "New Policies Area" section of Issues and Options, the importance is noted of reducing Climate Change. This needs considering in the context of MSGV	

Respondent Name	Respondent Organisation	Comment	Attached documents
		alternatives - these are not real alternatives and have little in terms of pros and cons.	
wwarden		I'll leave it to the local residents and interested parties to comment, although I really do feel this is the wrong development in a very poor and unsustainable location. What's proposed would have visual, environmental, ecological and traffic & transport impacts and couldn't be considered as sustainable development on any level. Also, built development on the scale proposed would increase surface water run off and probably add to the local flood risk. It's appreciated why NSC has felt the need to include this proposal but I suggest you might think again.	
Z Warbutton		I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Churchill Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the JSP process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the independent inspectors. In my opinion houses should be built near to Bristol. Increase in cars will put a strain on existing infrastructure and increased pollution.	

Document Part Name

Q16. Do you agree with the principles set out for Mendip Spring Garden Village and would you suggest any changes to these?

Respondent Name	Respondent Organisation	Comment	Attached documents
AH WH		<p>We are opposed to the proposals for the SDL of Mendip Spring Garden Village for the following important reasons:</p> <p>Employment and Out-commuting If the A38 transport corridor "Garden Village" development of 2.800 houses proposed in the latest version of the Joint Spatial Plan is approved, then the local adult population will increase substantially. Local work opportunities for a large population expansion of this size are very limited. Therefore the likely centres of employment will be Bristol, Weston-super-Mare, Taunton and further afield, all of which will require a significant out commute to reach.</p> <p>It would require a significant amount of investment to achieve an acceptable and affordable standard of public transportation to these employment hubs to mitigate against an increase in out commuting by a larger community. An increase in out commuting will further congestion, pollution and have overall a negative impact on both rural and urban communities. You will be aware that road traffic already contributes significantly to the total carbon emissions in the West of England. Your plans for this type of "rural urbanisation" development must not be allowed to continue if these statistics are to be potentially made worse by this site proposal.</p> <p>We noted with interest from the list of locations not considered in the spatial strategy a number of locations deemed unsuitable due to "potential out commuting" and "less well related to major areas of employment". For instance, we noted with interest the concerns of developing Pucklechurch and the surrounding area; <i>"Strategic growth will severely exacerbate congestion and air quality issues along radial routes into Bristol, where road space is significantly constrained by the nature of built form so limiting the potential for necessary substantive strategic public transport, walking and cycling interventions. The locality is also less well related to major areas of employment than proposed growth points at Yate & Coalpit Heath."</i></p> <p>Environment The area of concern is a natural flood plain leading into the Chew Valley from the Bristol Channel Coast between the Mendips to the South and the hills to the North, close to the communities of Wrington and Redhill. The proposed site neighbours' areas that are classified in part to be zone 3 flood zone according to the environment agency and therefore at regular risk of significant flooding.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Localised flooding is already a concern as the published recent rainfall and flooding evidence will uphold. The further development of an already water logged land with concrete and Tarmac will only compound this problem. The area is generally regarded as “wet” with a very high water table. This will preclude the use of “soakaways” in new build design and thus will require a complex and expensive drainage provision, which has not been considered in the BNP study.</p> <p>The Mendip hills are an Area of Outstanding Natural Beauty. A prerequisite of such a title, especially with reference to an AONB involving altitude and vistas are that the areas abutting are also protected to degree, to uphold this fact. We noted the location of Twerton, Bath was deemed unsuitable for the following reason:</p> <p><i>“It would cause significant harm to the setting of the World Heritage Site and whilst it is not in the AONB, it is on the edge of Bath and is visually prominent, thereby causing harm to the AONB. As such development would contradict national policy...Therefore this location is not suitable for development in the plan period”.</i></p> <p>The site proposal contravenes local and national planning policy in failing to conserve, respect, contribute to and enhance landscape, natural scenic beauty and tranquillity of the Mendip Hills AONB.</p> <p><u>Community Harmony & Autonomy</u></p> <p>If this proposal is processed it will go against the wishes of the existing community who have engaged thus far in “open consultation” but whose frustrations are increasing due the lack of understanding, acknowledgement and action on genuine concern on the effects on our rural communities.</p> <p>We have a social responsibility to welcome expansion in response to the recognition of a growing population. In deed over 200 new homes have recently been approved in Langford, a proportion of which are already being built. The existing population’s view must be revered, in order for community harmony, well-being and welfare to be maximised. Expanding a local rural population rapidly can only endanger this balance. Most individuals choose a rural lifestyle for the benefits that small community living brings, including easy access to the countryside, low pollution (noise and light as well as from the burning of fossil fuels), “community spirit” and interaction with local wildlife.</p> <p>The location of Bridge Yate and Oldland Common has been deemed unsuitable for the following issue.</p> <p><i>“Strategic growth would also further divorce existing communities from physical and visual access to the countryside. Therefore, this locality is not considered suitable for strategic level growth but may have potential for some nonstrategic growth to support local services.”</i></p> <p>In summary we feel that this proposed “garden village” development in the Mendip Vale is wholly unsuitable for a number of extremely important reasons.</p> <p>We strongly object to this proposal in its current state and support the view that other sustainable development areas should be considered, alongside a general review of the local green belt arrangements. Failure to consider a development on a very small proportion of the Green Belt to the South of Bristol will lead to urban sprawl in the more sensitive and beautiful landscape of the Mendip Vale and the surrounding Area of Outstanding Natural Beauty.</p> <p>The Green Belt policy is outdated and must be reviewed to prevent cities such as Bristol from being strangled by 70-year-old legislation. We note that North Somerset is not against Green Belt development following its recent approval of further development at Bristol Airport, as well as proposals within this plan to potentially remove Bristol Airport from the Green Belt restrictions it is currently subject to.</p> <p>If government directed housing targets are to be met in an efficient and timely manner whilst respecting the National Framework Policy guidance on sustainability, environmental and climatic impact this “garden village” proposal should be removed from the Joint Spatial Plan immediately.</p>	
Alder King (M Cullen)		<p>Design Principle 1</p> <p>3.1 The first design principle is supported and the University of Bristol acknowledges the opportunities available to embrace best practice and innovative approaches to place making. These could include opportunities to improve streets as places, create squares and parks as multi-use destinations and design buildings to support places. The University of Bristol seeks clarification as to what ‘technological advances’ will ‘maximise the quality and effectiveness of development’. It is assumed this includes</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>technologies like supporting high quality communications, provision of spaces for charging plug-in and other ultra-low emission vehicles, making provision for clusters or networks of knowledge and data-driven, creative or high technology industries, but further clarity is required such that the plan is ultimately precise.</p> <p>Design Principle 2</p> <p>3.2 The second design principle discusses the potential to create a new Conservation Area at lower Churchill that would contribute to the areas character and appearance. This is considered to be a reverse logic. Given the potential strategic gap between Churchill and the new SDL, it is unclear as to the "need" to establish a new Conservation Area. Normally areas are designated as Conservation Areas when they have a definite architectural quality or historic interest sufficient to merit designation. No information or evidence has been provided to suggest that this is the case for Churchill.</p> <p>Design Principle 3</p> <p>The physical separation of the SDL from Langford and Churchill via a strategic gap is supported. The Council's resistance to extend the SDL beyond the pylon corridor or Common Lane to the west is also supported. In addition to this, the University of Bristol welcome a lower density fringe of development on the western side of the proposed SDL with no encroachment into the open countryside to the north west, particularly beyond the proposed Sandford and Churchill Bypass. Further, it is noted that it is also the Council's aspiration for land towards the Strawberry Line to have strategic ecological/environmental mitigation potential and that the setting of heritage features are to be safeguarded around places like Churchill Green and Front Street. Therefore there is scope to extend the proposed SDL eastwards following the line of the bypass to the A38 where greenfield land is less constrained in planning policy terms and there are also numerous brownfield redevelopment opportunities.</p> <p>Design Principle 4</p> <p>3.3 A new primary school, market square/village green and local centre, which will serve the wider area, are all supported.</p> <p>Design Principle 5</p> <p>3.4 It is acknowledged the SDL will be developed along garden village principles with a high quality of green infrastructure throughout and surrounding the village, and exemplary design quality. This aspiration is supported in principle, albeit, in order to deliver these successfully, the Council may require more land to become available to the east towards and beyond Stock Lane. Therefore, in order to invest the money in delivering high quality green infrastructure and exemplary design, the commercial realities faced by the construction industry must be realised and thus additional land and thus a likely quantum of development should be set aside to ensure the design principles in the evolving masterplan can realistically be delivered.</p> <p>Design Principle 6</p> <p>3.5 A woodland corridor to the south of the development which links in with the existing woodland features and frames the southern edge of the development is supported.</p> <p>Design Principle 7</p> <p>3.6 The University of Bristol supports maximising permeability within the SDL and its interrelationship with the surrounding area. It is understood this will be achieved by creating a network of walking and cycling routes across the village, to Langford and Churchill, the secondary school, the Strawberry Line and other services and facilities further afield.</p> <p>Design Principle 8</p> <p>3.7 It is not clear as to how new residents will be encouraged to 'lead community engagement'. If this design principle reflects the delivery of community facilities throughout the SDL or a community hub in the local centre then this is supported. Arguably this principle is not related to planning and would become more of a management tool following the development of community facilities within the local centre for example. If it relates to a pre-application or pre-masterplan process then the engagement of the "community" in this is supported and can be facilitated by the lead developer or lead landowner.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Design Principle 9</p> <p>3.8 With regard to the design principle 9, it is acknowledged that land will be allocated for employment uses with good access to the Sandford and Churchill Bypass which the Council recognise could incorporate the existing industrial site off Stock Lane. The University's veterinary college is also located off Stock Lane, and is itself a major employer in the local economy. The University owns significant land holdings immediately to the north of the college, in an area in which the route of the bypass is shown. Given this land holding is in a single ownership, and is well related to a major employer, it seems sensible to explore incorporating this land into the SDL.</p> <p>Design Principle 10</p> <p>3.9 Design principle 10 is supported whereby outdoor recreation space and leisure facilities will need to be engrained in the master planning to provide the opportunity to embrace healthier lifestyles. It is acknowledged that some of this can be delivered around Windmill Hill which acts as a key landscape feature forming part of the corridor of open space and opportunity for recreational use.</p> <p>Design Principle 11</p> <p>3.10 The integration of Churchill Rhyne and other water courses in the green infrastructure network as part of a wider sustainable drainage solution is supported.</p> <p>Design Principle 12</p> <p>3.11 By locating the SDL to the north of Windmill Hill and in the direction of Langford rather than to the west or south minimises any visual impact from the AONB. Therefore there is scope to extend the proposed SDL eastwards following the line of the bypass to the A38 where greenfield land is less constrained in planning policy terms and there are also numerous brownfield redevelopment opportunities. As stated in Design Principle 9 above, the University owns significant land holdings to the east of the proposed SDL and north of the college and given the land holding is in a single ownership, it seems sensible to incorporate this into the SDL.</p> <p><i>5 Ref: MH/MC/89837 December 2018</i></p> <p>Design Principle 13</p> <p>3.12 The University of Bristol supports a loose boundary to the west of the SDL as a transition into the open countryside. It is agreed that housing areas will be rural in character and provide a range of sizes and tenures and affordability, with higher densities around the local centre. This can be explored through the necessary master planning in due course.</p> <p>Design Principle 14</p> <p>3.13 It is acknowledged that improvements in Langford will follow the completion of the Sandford and Churchill Bypass which will form the outer edge of the SDL. However, the opportunity for development / improvements to Langford should not rely solely on the delivery of the new road which would not be deliverable in the short term and should therefore not stifle opportunities for any 'non-strategic' growth to take place.</p> <p>Design Principle 15</p> <p>3.14 Please refer to the commentary provided in relation to design principle 2. That said it is felt Design Principle 15 could be deleted as it is comfortably addressed as part of Design Principle 2. Whilst Design Principle 2 refers to the Churchill Front Street, it could be expanded to include reference to Churchill Green and the Grade I Listed church.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex		see below	
Alex		see below	
Andrew		No I do not agree with the principles. The proposal is inconsistent with the objectives of the JSP. The proposed housing estate does not appear to meet the criteria, as defined, of a garden village in that it will not be capable of independent function, not least due to the lack of employment opportunity. It will damage the AONB. It appears that the proposed development may not be financially viable but viable development would be possible at Ashton Vale, which would also be more sustainable in spite of requiring a re-designation of a very small proportion of the districts green belt.	
Avon Wildlife Trust	Avon Wildlife Trust	<p>Given the ecological sensitivity of the site we think that one of the principles for its development should be a commitment to ecological net gain.</p> <p>We strongly support the need for outdoor recreation to be embedded in the master planning. There will be a significant challenge in mitigation the potential effects of recreation pressures of local natural green space and this should be taken into account at early as possible in the process.</p> <p>The transport schemes required to support the development in Mendip Spring Garden Village is primarily based on building new roads in very ecologically sensitive areas. The land take required for these new road has to potential to destroy ecological rich habitat in the North Somerset Levels and Moors which provides 3% of the remaining wetland habitat in the UK. These new roads also have the potential to cause significant severance of greater and lesser horseshoe bat commuting routes. These routes are particularly sensitive in this location as they provide links between winter hibernation sites and summer maternity roosts.</p> <p>All development proposed in the local plan must be compliant with North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document.</p> <p>Many of the waterbodies in North Somerset are failing to achieve the environmental targets set for them in the Water Framework Directive. It is vital that any new development does not have an adverse impact on the surrounding waterbodies WFD status.</p>	
Blagdon PC	Blagdon Parish Council	We support the principles but remain concerned about the authority's ability to deliver these.	
Bloor Homes South West		<p>The principles set out for Mendip Spring Garden Village are broadly agreed and reflect the proposed vision.</p> <p>However, we do consider a further principle should be added:</p> <ul style="list-style-type: none"> • A masterplan will be produced for the site which maximises effective and efficient use of the available developable land, assisting in the viability of the scheme, helping to justify key infrastructure funding, and ensuring there is a critical mass of housing to secure the vitality of a village in the long term. 	
Burrington Parish Council	Burrington Parish Council	The principles are vague and unconvincing. The concept diagram gives no confidence that physical opportunities and constraints like Churchill Green have been understood. Relationships with Churchill and Langford are not expressed on the diagram. Alternative Scenario 3 seems to show a road across Churchill Green. is a mushroom farm the appropriate place for a business park?	
C Pegge		<i>I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors.</i>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>There is poor transport infrastructure, currently significant congestion which can't be mitigated, no local jobs so a 15 mile car commute to Bristol or further afield, adding to pollution. This does not represent a sustainable development and is not in the interests of the population of North Somerset, rather it is in the interest of the council looking to raise finances using a central government grant and developing property.</p> <p>The land floods and this will worsen.</p> <p>There is excellent land near the new south Bristol link road within an easy cycle ride to the city where the jobs are and access to public transport including the Metro bus.</p> <p>The land outlined for Churchill Village is next to the Mendip Hills AONB and will irrevocably change the character of that area and that of the local villages which will blur into satellites of the new town.</p> <p>The green belt question is spurious and outdated and there is a precedent for building in the green belt already, namely the link road the airport etc etc.</p> <p>I am appalled that councillors and planners are engaging with some other logic than that of their residents, presumably to satisfy other political and financial needs than the reality on the ground.</p> <p>Yes we need new houses for local people and piecemeal small village developments are fine to satisfy the needs of the rural community but most residents are commuters so why aren't we designing with them in mind? I know where my children would rather live if affordable housing became available for first time buyers in North Somerset and that would be in or near Bristol so that they can participate in urban life. If they want full blown rurality they won't choose a new suburban soulless development, one huge housing estate with no variety.</p> <p>Please drop this plan and spend your time and money developing more appropriate and acceptable options</p>	
Congresbury Parish Council	Congresbury Parish Council	<p>The principles miss any mention to employment and transport. The new village will be a commuter village putting large demands on the road system that have been overlooked. Therefore this is an unsustainable location. There are no details on how the lump of concrete will not cause an increased risk to flooding on the moors and the increased risk to Congresbury.</p>	
D Goodlife		<p>We support CALRAG.</p> <p>We do not support the proposed new town near Langford/Churchill as it is not near any good transport links to Bristol, most people will work there and commute on the already congested A38/A370 it is not viable. This number of homes is too many it is not a village. WSM general hospital is already inadequate with no A&E services at night, the hospital would not cope with this volume of people.</p> <p>Current homes being built at Langford are very expensive in fact well over priced in comparison to similar in the area, where are the smaller affordable homes??</p> <p>The development is too close to windmill hill as is the proposed road which is not needed even if the village goes ahead, no you can not destroy our cricket ground and take down the old chestnut trees for this purpose, its unacceptable.</p> <p>Sandford and Banwell the latter most importantly does need a bypass Churchill and Langford already have one its the A38.</p> <p>The development is too large and in the wrong place.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Ecomotive Ltd		As above, we consider that community-led delivery and ownership should form a key component of any new development in Churchill and should therefore be included within the core principles for Mendip Spring Garden Village.	
Ginny		<p>I would just like to record my objection to the planned destruction of the North Somerset country side in the pursuit of building a what in my opinion is a new suburb for the City of Bristol.</p> <p>These planned houses if required should be built in Bristol and if space does not permit the boundary should be increased to accommodate.</p> <p>All the residents that work will in the main commute to Bristol and therefore the logistics are environmentally damaging and are not sustainable.</p> <p>We in the villages are desperately trying to raise money to take legal action against what is our elected council and it is illogical. Please represent the interests and views of your constituents so that we have a common endeavour.</p> <p>We as residents of North Somerset do not own the countryside but are custodians for future generations.</p>	
J Comley		<p>Putting aside the fact that there is already outline planning permission granted for over 600,000 homes across the UK and the proposed development is not actually required at all...</p> <p>1 The need to protect landscapes and the natural environment. Your proposal will destroy huge swathes of sensitive, beautiful, ANOB and productive land, while the proposed highways will bring increased pollution to existing communities, and in the case of Churchill will see the destruction of the village's recreation facilities ie cricket and football pitches, and the virtual destruction of the ancient common land at Havyatt Green.</p> <p>2 Communities close to services, facilities and jobs. Local services/facilities are in the main fully/over utilised and there are few new local jobs available, of these most are low skill, poorly paid and insecure. The Council has a very long record of failing to generate quality jobs in the area, and there is no reason for this to change. The established and vibrant existing communities of Churchill and Langford will be overwhelmed and destroyed. Any development needs to be closer to the economic powerhouse of the South West – Bristol.</p> <p>3 Opportunities to create more jobs and support local business. The Council has a very long record of failing to generate quality jobs in the area and this won't change. Indeed its policies have often actively worked against job generation. The Council's support for local businesses over the years has been weak, at best. There is no reason to believe that the council's performance will improve, indeed with such a huge proposed project it will probably be worse as it struggles to cope with the 'opportunities' it has created.</p> <p>4 Additional homes supporting local schools. Sorry, this is the wrong way round, local schools, many of which that are already oversubscribed, will be called upon to support the new homes. The quality of education serving the new town will inevitably fall. Existing and new schools will find quality teacher recruitment difficult due to current and future teacher shortages.</p> <p>5 Traffic on roads and getting around.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Even central Government recognises that you cannot build yourself out of traffic congestion. Your proposal will simply push traffic and pollution into pristine countryside, at a huge environmental and sociological cost, for the sake of some small wins eg reducing congestion in Banwell/M5 WSM junction. When the Banwell problem could be improved simply by excluding HGVs by making the A370 their primary route to Bristol etc</p> <p>6 Energy efficiency of new homes and opportunities for renewable energy. Since when did North Somerset Council influence the construction of quality energy efficient homes, or lead to a meaningful degree on encouraging and applying renewable energy over the past 20-30 years? In addition the planning gains negotiated by the council with developers have also been very meagre.</p> <p>7 High quality design and place making. Since when did North Somerset Council influence the high quality design of new homes? Never. Just look at the location and design of most of the new homes in WSM as an example. There is no reason why this will change for the proposed development, that I am told will also feature high density housing.</p> <p>I am not against well thought through and democratic new development projects, it is just that this is not one of them. Indeed it is the opposite and must be stopped.</p>	
J Dixon		<p>I object to the proposed development of 2,800 houses in addition to the 300 house already under construction in this area. My reasons are as follows:-</p> <ol style="list-style-type: none"> 1. The houses and associated road development will completely alter a beautiful and historic area of the country next to the Mendip AONB 2. There will be an estimated 5,000 cars going in and out of Bristol every day on already congested roads with associated increase in air pollution and traffic noise. 3. The costs of this development are high, resulting in little scope for affordable housing. 4. There are very few local employment opportunities, resulting in a great deal of unnecessary commuting for work and leisure. 5. There is a much more sensible proposal for new housing west of Bristol, next to the newly built link road, with easy access to work, education and leisure, and with no need to build fresh expensive and damaging main roads. <p>I would also point out that the new Issues and Options consultation is premature before the Independent Inspectors' decision. The consultation before there is an independent examiners decision amounts to a waste of taxpayers' money.</p>	
J Smith		<p>We are totally opposed to the proposals for the SDL of Churchill/Mendip Spring. The Local Plan 2036 consultation for Mendip Spring Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the Joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the independent Inspectors.</p>	
Jan Murray	CALRAG	<p>The Mendip Spring Garden Village proposal:</p> <ol style="list-style-type: none"> 2.4. Fails to offer joined up thinking: <ol style="list-style-type: none"> 2.4.1. Is not consistent with the JSP Technical Evidence Work consultation 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>released on 12th November relating to transport.</p> <p>2.4.2. Has not considered the extremely important JSP Habitats Regulations Assessments (Another reason why the consultation is premature).</p> <p>2.4.3. The consultation documents for the Joint Transport Plan consultation do not come out until January – after the I & O consultation is over. (Another reason why the I and O consultation is premature)</p> <p>2.5. Does not make it clear that this is NOT a consultation on the SDLs. Summary 2-2.5 above</p> <p>We have studied all the documentation. However, in light of the above, how can the public (or even some councillors) who cannot study it, give informed responses to the Issues and Options consultation?</p>	
JLS		I disagree with the principles. The proposal at Mendip Spring does not meet the criteria of a garden Village. It is naïve to assume that it would function independently and would just become another dormitory housing estate. Houses should be built near to employment sources.	
Jolly John		<p>My comments made on the West of England JSP are as below and I consider that they also apply to the work you are carrying out on the NS Local Plan 2036. As far as I am concerned the discussion questionnaire that you have circulated for Churchill is irrelevant as the JSP concept is unsound. I strongly support the comments made by CALRAG and Burrington Parish Council.</p> <p>Road Improvements North / South across N Somerset B3133</p> <p>The JSP is unsound because currently main roads in North Somerset focus towards Weston Super Mare or Bristol. The N/S A3133 link between Churchill and Clevedon is very poor passing through congested villages. This is not helped by the proposed link from Junction 21A to A38 Havyatt Green.</p> <p>The M5 (Junction 21A) to the A38 road link provides limited access only to and from the M5 Southwards, it would have to be completed in its entirety before any housing development could take place and it is unfunded.</p> <p>My proposals are shown on the attached plan and are as follows:-</p> <ol style="list-style-type: none"> 1. New A road from A38 at Havyatt Green to A370 West of Congresbury. This will join Brinsea Road and could run partly on the old Railway track. It will also enable Stock Lane from Langford to the Substation to be declassified with a weight limit. This would bypass Congresbury and give better road links to Wrington. 2. New road and river crossing from West of Congresbury to A370 Smallway Junction. This would complete the bypassing of Congresbury. 	<p>JSP Road Improvemets North South across N Somerset B3155.docx (1.3 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>3. New Road from A370 to Arnold's Way, Horsecastle bypassing Yatton and adjacent to the Strawberry Line.</p> <p>4. Improvements to existing B3133 from Horsecastle to Kenn.</p> <p>5. New Road from Kenn to M5 Junction 20. This would relieve traffic in Clevedon Central Way.</p> <p>6. Improve A370 from Congresbury to M5 Junction 21 with improvements to Junction 21 roundabout. This with Item 1 would be the link from the M5 South to the Airport.</p> <p>7. Upgrade Ashey Lane to an A road from A38 to A368 at Bourne. The A368 from Bourne to Churchill Gate could then be declassified and weight limits enforced.</p> <p>8. Complete the Banwell Bypass as a single carriageway for local traffic, possibly declassifying A368 and A371 as B roads.</p> <p>Road Improvements B3133 and Airport Access</p> <p>Improved Access from the South to the Airport would be from the M5 Junction 21 on an improved A370 to Congresbury and the New B3133 to the A38 at Havyatt Green.</p> <p>This would relieve traffic from the A38 from the M5 at Brent Knoll and give better access to the Airport from Weston Super Mare.</p> <p>An important condition when these new and improved roads are built is that they should not lead to infill housing between the existing communities and the new roads.</p> <p>Further comments on the JSP</p> <p><u>The Employment Land Requirement</u> for the proposed Churchill Village is minimal and due to its proposed location of Employment Land, it may not be attractive to potential developers.</p> <p>This village location does not therefore meet the sustainability targets due to lack of local employment opportunities, poor public transport and no rail opportunities.</p> <p><u>Churchill Garden Village is insound.</u></p> <p>This location does not meet the sustainability targets due to lack of local employment opportunities, poor public transport and no rail opportunities. Plans are supposed to avoid the creation of remote commuter dormitories with an excessive dependence on the private car.</p> <p>The planned development would have substantial adverse impacts on the local environment and neighboring settlements.</p> <p>The high voltage overhead power lines and the new Cheddar to Barrow Tanks water main bisect the site longitudinally. Also new housing should be kept away from the Major Highway proposed from M5 (junction 21A) to the A38.</p> <p>The area has productive Agricultural land and has a high Amenity value close to the Mendips ANOB. Part of one local amenity, Mendip Spring Golf Course will be lost to the proposed development.</p> <p>Existing local residents generally have to commute to work etc by car as existing Public Transport is totally inadequate and this causes local congestion. The proposals for 2675 new houses would add to this congestion as the proposed Public Transport is unlikely to sustainably satisfy the demand.</p> <p>The housing proposed for Churchill Village should be relocated at Ashton Vale that is:-</p> <ol style="list-style-type: none"> 1. Well-related to South Bristol. Bristol Airport and the City Centre. 2. Potentially served by existing and planned strategic transport infrastructure including the South Bristol Link Road, a Metro Bus Route, improved links to the Airport and a new Railway station. 3. A large enough area to provide a mix of land uses including employment and local centre facilities. 4. Already assembled under the control of a developer that would make planning and implementation of a large scale, mixed use development with its associated infrastructure a more feasible proposition. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
Jonask		<p>I wish to make it known that I do not endorse in any way at all the Local Plan 2036 as it currently stands. It is an ill conceived document in so many ways and shows a total disregard for local residents views, the effects on an already strained infrastructure and a complete disregard for the principles of the Green Belt.</p> <p>The proposal of 2800 homes in the Churchill/Mendip Spring new town is a complete waste of tax payers money. It is also prejudging the outcome of the Public Examination by the independent inspectors. You are assuming, incorrectly, that this New Town will go ahead.</p> <p>I live in Upper Langford on the Bath Road in the AONB. My house is adjacent to the A368. It is a listed property that is slowly disintegrating due to the ill effects of, you the council, allowing too many lorries beyond the limit of 7.5 tonnes to use this road as a rat run. It seems to me you do not stick to or apply your own rules. How can we trust you? This road cannot take further increases in traffic as would be the case if your plans go ahead.</p> <p>The same would apply to Stock Lane which is already at its limit. The buildings you have already endorsed without any consideration of the infrastructure is nothing short of a disgrace.</p> <p>I will be joining the local action group Churchill Development Group and will be encouraging all my neighbours to do the same.</p>	
K Hanson		<p>Referring to 4.2 (p 42) Mendip Spring (Churchill) Garden Village (the 2,800 houses and major new roads here in Churchill) we think the following key words might help you. (Numbers refer to specific questions in the I & O document).</p> <p>4.2 (p 42) Questions 15-18 Mendip Spring (Churchill) Garden Village</p> <p><i>"I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors." ALSO</i></p> <ul style="list-style-type: none"> • Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) • Transport infrastructure is environmentally damaging. <ul style="list-style-type: none"> ◦ Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. ◦ Pollution - impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems. 	
Mendip Hills AONB unit	Mendip Hills AONB Partnership	<p><i>These SDLs (strategic allocations) are still to be tested through the Joint Spatial Plan examination. As set out in our comments dated 8 January 2018 to the Joint Spatial Plan consultation, we have strong concerns regarding the proposed allocation of Banwell and Churchill garden villages.</i></p> <p>Under bullet point 1, it is unclear what is meant by ‘innovative approaches to placemaking including technological advances, and to maximise the quality and effectiveness of development’.</p> <p>With reference to bullet point 2, what is meant by ‘design and character will be deeply rooted in the rural locality with cues taken from the surrounding landscape’.</p> <p>With reference to bullet point 5, opportunities to link in to the wider green infrastructure network will be important. How will ‘exemplary design quality’ be secured?</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>With reference to bullet point 11, green infrastructure with integrated SuDS and landscaping must respect the surrounding landscape character and drainage patterns within the setting of the Mendip Hills AONB.</p> <p>With reference to bullet point 12, not only should the development layout, form and design respect the setting of the Mendip Hills AONB, but any design principle documents and relevant master plans should include considerations of the protected landscape and the special qualities of the AONB. Views from and towards the Mendip Hills AONB should be protected particularly when considering the appropriate scale of the development, layout, design (including lighting) and landscaping. The impact of development on the protected landscape and the special qualities of the Mendip Hills AONB would need to be carefully considered and supported by appropriate and acceptable mitigation measures.</p> <p>The proposed development will also increase the impact on the Mendip Hills AONB particularly as relates to pressures for recreation arising from the proposed new developments and on transport infrastructure. Not only will the impact of the proposed development on the protected landscape need to be considered with regard to layout, form, design and landscaping, but also the wider pressures from the proposed development and appropriate and acceptable mitigation measures would be required.</p>	
moore@		<p>It is inappropriate for the council to be consulting further on these proposals when there are significant issues that have been raised via the JSP consultation, which is still with the Independent Inspector. Within that I also specifically object to any proposal to create a "Green Village" at Churchill, as there is no way to create a sustainable and economically viable new settlement at this site.</p>	
Mr and Mrs Lait		<p>We do not agree with these principles.</p> <p>If a new garden village is to be built it should be sited nearer the existing road networks and employment opportunities (mostly in Bristol) for its new residents. This would avoid further congestion on already congested roads, long traffic queues and the stress caused to drivers having to undertake a daily commute.</p>	
N Goldhawk		<p>I, a resident of Langford, am totally opposed to the proposals for the SDL of Churchill/Mendip Spring.</p> <p>The plan is highly inappropriate and a waste of tax payers' money. It risks causing serious and irreversible damage to the local, and wider, area such as: serious congestion on small and larger local roads; a lack of affordable housing; the destruction of the local environment including Windmill Hill and Mendip Hills AONB.</p> <p>Please reconsider the plan and seek a better and more sustainable alternative.</p>	
P Luddington		<p>I write in response to the Issues & Options consultation for the 2036 local plan to register my opposition to the new housing proposals for the Strategic Development Location near Mendip Spring Golf Club Churchill. These proposals will not meet the demands of those in greatest housing need. Most of the homes built in locations in open countryside are likely to be larger and more expensive than average homes in North Somerset. These are the homes developers prefer to build in rural locations because they are more saleable and more profitable. They are likely to be purchased by 2nd or 3rd time buyers who are already well catered for in the new build sector. These proposals do</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>nothing to provide homes where people most need them: homes within easy access to/from Bristol and close to main transport routes. Future residents of Mendip Spring are likely to be long distance commuters using private cars to access Bristol via an already overloaded A38 or the B3133 to access the M5 northbound.</p> <p>The scale, location and linear layout of the proposed development does not lend itself well to the establishment of an efficient, frequent and well used public transport system. It is likely that travel distances, lack of demand, multiplicity of route destinations and poor public transport reputation locally will result in an inadequate service provision and, by default, more car dependent communities. The increased traffic generated will place an intolerable burden on the surrounding road infrastructure. These roads are already unable to cope with current population and traffic levels.</p> <p>I also wish to register the opinion that the call for comments, at this stage, is premature as the proposals in question have yet to be examined by the JSP review. Your call for comments now prejudices the outcome of that review by the independent inspectors. The consultation should be rescinded pending the outcome of that review.</p>	
S Moore		<p>The principles informing the Mendip Spring proposal seem simplistic and naive and overlook the significant issues around lack of sustainable transport links and employment as well as the impact on the AONB and rural communities. This would create a soulless dormitory town and significantly add to pollution and congestion. Development should focus on sites closer to existing cities and towns. It is also inappropriate to be continuing to solicit feedback on these vague plans when the verdict of the Independent Inspectors on the JSP as a whole is not yet known.</p>	
Simon		<p>You suggest that "Housing areas will be rural in character and provide a range of sizes tenures and affordability". So far the evidence afforded by infill building on the developments in Churchill and Congresbury do not hold out much hope that this will be achieved. Current developments would be at home in any setting in the UK be it rural or urban.</p>	
Simon Hegarty		<p>In planning terms the proposed vision is misconceived by reason of the following:</p> <p>(a) It is undeliverable because: (i) It will not be possible to purchase the necessary land to carry out the development within the time contemplated by the plan and (ii) is dependent on the construction of roads from the M5 motorway requiring government funding which is unlikely in the absence of there being any sound economic case for it.</p> <p>(b) It is not viable because the cost of the necessary infrastructure to support such a large development in the middle of the countryside would be disproportionate and prohibitively high and would made the building of affordable housing in Churchill unviable .</p> <p>(c) It is unsound because(i) There is and will not be sufficient local employment to support the new development (ii) There will be no adequate public transport infrastructure to support the development in consequence of which many more journeys will be made by car in to Bristol (2011 Census Churchill and Lanford - 87% of those who travel to work commute to Bristol.*) (iii) The cost of necessary flood and drainage infrastructure wil preclude the provision of affordable housing.(iv) it is adjacent to the Mendip Hills AONB.</p> <p>(d) It is unsustainable because the location is too far from employment locations resulting in increased car movement , the lack of an adequate transport infrastructure, the unmitigatable damage to ecology and landscape, and substantial increase in pollution from traffic commuting into and out of Bristol(a City which aspires to be carbon neutral)</p> <p>In summary, the Mendip Spring Garden Village proposal (7.6 of the JSP) will be found to be unsound on public examination due to take place in 2019. The vision for this development is therefore fundamentally flawed.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Terry Harrold		"I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors." ALSO Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) Transport infrastructure is environmentally damaging. Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. Pollution - impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems.	
Tom Leimdorfer		These principles reflect a lame attempt at justifying and mitigating a fundamentally flawed proposal. Several of the design principles will not be deliverable, others will be so expensive as to make them unviable. Providing land for employment will not make the location attractive for potential employers without significant inducement.	
Viv Tomkinson	Congresbury Residents Association Group	The scale of proposed development is completely unacceptable - simply by allocation 2800 houses to this allocation means that the rural locality will be destroyed. There will be further decimation of the countryside in order to deliver the necessary road network. Residents will have to commute to Weston or Bristol to work adding to the volume of traffic on the already congested highway network and this increasing pollution and damaging air quality. There is limited evidence that employers will choose to locate their premises in this location - so it will just be a dormitory town and certainly not a Garden Village. The JSP's own reports already include evidence about viability issues associated with this SDL. Consequently it will not deliver the target for affordable homes. It is completely the wrong location for development on this scale.	
Wessex Water (Ruth Hall)	Wessex Water	There is an absence of an existing foul sewer network in this location. Further appraisal work will be required to provide options as to how this proposed garden village can be served. New developments can be served either by Wessex Water or by a new appointment and variation company (NAV). The principles should acknowledge the need for the masterplan to coordinate the delivery of infrastructure in its wider sense not just transport infrastructure.	
Winscombe and Sandford Parish Council	Winscombe and Sandford Parish Council	Proposals for a Mendip Spring Garden Village are considered to be misconceived development. However should this progress, to allow Sandford to remain a separate community protected strategic gaps should be created between Sandford and Banwell, Sandford and Churchill and Sandford and the Mendip Spring Garden Village.	
Wrighton Parish Council	Wrighton Parish Council	With only a modest elevation, it is doubtful that Windmill Hill will afford much of a 'mitigation' to the 'garden village' being highly visible from the Mendip AONB. (Windmill Hill is only 75m AOD whereas Wavering Down is 211m and Callow Hill 223m AOD).	

Document Part Name

Alternative scenarios

Respondent Name	Respondent Organisation	Comment	Attached documents
JLS		It is premature to invite comments on these plans before the next stage of the JSP has reported.	

Respondent Name	Respondent Organisation	Comment	Attached documents
KMH1		This option should never be considered. The proposed road severs communities and its social cohesion. Cricket, football, recreation, enjoyment of Windmill Hill will be heavily impacted.	
moore@		It is inappropriate for the council to be consulting further on these proposals when there are significant issues that have been raised via the JSP consultation, which is still with the Independent Inspector. Within that I also specifically object to any proposal to create a "Green Village" at Churchill, as there is no way to create a sustainable and economically viable new settlement at this site.	
S Moore		<p>I am fundamentally opposed to the proposal to place a Garden Village at this site - regardless of the options provided. This is not a sustainable approach to development, and does not make sense from an environmental, social or economic perspective. I also think it's inappropriate to be consulting on the details of this proposed settlement before the verdict of the Independent Inspector is known.</p> <p>I am also particularly unclear about the problem that the proposed Churchill Bypass is intended to address. The diagrams provided are unhelpful as they just show the road disappearing into open countryside. The JSP plans are no clearer. The implication is that this road would just funnel traffic further up the A38, which would still be a single carriageway road, so it would add to rather than alleviate the problems with the A38 in and out of Bristol.</p>	

Document Part Name Q17. Do you have any comments on the Concept Diagrams and Alternative Scenarios set out?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alder King (M Cullen)		<p>Q17. Do you have any comments on the concept diagrams and alternative scenarios set out?</p> <p>4.1 Having considered the design principles which will inform the evolving masterplan for the SDL, it is apparent that further land to the east of the proposed garden village is necessary if the design principles are to be accomplished alongside delivering the required number of dwellings. As stated above, in order to invest money in delivery of key components like high quality green infrastructure and exemplary design, the commercial realities faced by the construction industry must be realised and thus additional land should be set aside to ensure the design principles in the evolving masterplan can realistically be delivered.</p> <p>4.2 Whilst the University of Bristol support the proposed vision for the SDL, they also support further development to the east towards Stock Lane where there is potential to extend development on land outside of the flood plain. Whilst this presents the opportunity to release greenfield land for development, it would also provide the opportunity to review brownfield land that is either vacant or would otherwise better lend itself to alternative forms of development.</p> <p>4.3 Furthermore, given the Sandford and Churchill Bypass will form the outer edge of the proposed SDL, its strategic route to the A38, airport and Bristol is envisaged to route east through a mixture of greenfield and brownfield land owned by the University of Bristol thus improving the sustainability credentials for future development prospects in this location. By extending the development opportunities of the SDL to the east towards Stock Lane rather than to the north this will stay within the outer edge limits of the proposed bypass.</p> <p>4.4 The potential for a strategic gap between Langford/Churchill and the Mendip Spring Garden Village is essential and will help prevent any coalescence between the settlements whilst providing a multifunctional network of green infrastructure and opportunity for recreational use.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>4.5 The strategic gap directly to the south of the SDL and the settlement of Churchill also has other important benefits including the protection and enhancement of local heritage assets and their settings including Churchill Court unregistered park and garden and the listed buildings at Churchill Green and Front Street mentioned above.</p> <p>4.6 Therefore any further growth at the SDL should be directed east towards Stock Lane. Whilst it is appreciated that the concept diagrams are not final masterplans, it is noted that higher density housing is focussed around the mixed use local centre. Furthermore, where a lower density fringe of development is expected on the western side opening out to the countryside beyond, the opportunity exists to achieve higher density development as you move eastwards through the SDL towards 'Monaghan Mushrooms' and existing brownfield sites fronting Stock Lane. The justification for higher density development in this location would be the fact that the eastern extremity of the SDL does not open out onto 'open countryside' beyond but instead would approach and complement the existing brownfield development on both sides of Stock Lane.</p>	
Avon Wildlife Trust	Avon Wildlife Trust	No comment	
Blagdon PC	Blagdon Parish Council	We have no specific comments.	
Bloor Homes South West		<p>We consider that the concept diagram in the Issues document provides a reasonable starting point to consider how strategic housing development could come forward in this area, however we consider that both of the alternative scenarios should be considered:</p> <ul style="list-style-type: none"> • Further development to the north towards Stock Lane; and • Further development to the west towards Common Lane. <p>In order to maximise the benefits from the delivery of a new Garden Village, the delivery of a settlement with sufficient critical mass to help deliver and support key services and infrastructure, including high levels of quality green infrastructure, should be maximised where appropriate to do so. It is our view that there are limited constraints to a wider development being considered within the areas towards Stock Lane and towards Common Lane and both should be progressed.</p> <p>In addition to these, we consider that a further scenario should be considered. There is an opportunity for development to be accommodated further south than currently identified, while still retaining a substantial strategic green space and physical separation between the settlements and achieving the objectives of the allocation. This may give the opportunity for shared infrastructure, such as green space, which can provide a meeting space for both communities.</p> <p>We consider that further consideration of all of the three above scenarios is justified and the correct course of action at this stage of the plan making process, for the following reasons:</p> <ul style="list-style-type: none"> • Inclusion of further land could lead to a greater number of homes being delivered from this SDL which will assist North Somerset in accommodating the strategic growth aspirations in both this plan period and beyond (creating positive planning platform for the delivery of a sustainable garden community and much needed future housing growth. Importantly, it will also make the most efficient use of the identified location for development, and allow comprehensive planning and infrastructure delivery; • As demonstrated on the accompanying indicative site location plan at Appendix 1 (showing the land being promoted by Bloor Homes), there is further available land to the north, to the west, and to the south; • This further land, like the land currently identified in the Issues Document Concept Diagram, remains free from major planning constraints; • Establishing a critical mass of housing in this location will assist in providing the amount of homes required to viably deliver the key piece of local infrastructure, the proposed Sandford and Churchill Bypass. 	B1 OA3032 Churchill GV Representation SUBMISSION.pdf (2.8 MB)

Respondent Name	Respondent Organisation	Comment	Attached documents
Burrington Parish Council	Burrington Parish Council	See previous comments. The diagrams are simply too vague to convey any meaningful information about how the proposed Garden Village might work and interact with its surroundings. How will it be accessed from the bypass and existing local roads and how does the indicative local route relate to either? A more logical local distributor would run west and east of Churchill Green, connecting Churchill and Langford and relieving local routes like Ladymead Lane and Dinghurst Road with the possibility of a connection to the A38 at Churchill Gate. That comment is not intended to be a proposal but simply to demonstrate how opportunities and constraints might have been considered if this were a credible proposal.	
Congresbury Parish Council	Congresbury Parish Council	You have not explored the alternative of a more sustainable location in Ashton Vale.	
Cresten		They are far too vague, and do not include details of the 2 SAC Bats foraging zones, green areas, green corridors that are needed. Each scenario is far too close to Sandford and Churchill. There is no consideration of wide enough buffer zones for Sandford and Churchill, or how the cycling routes etc could be achieved, given the non-strategic building currently going on in both villages.	
Darren Tape (BSCLtd)		<p>his Statement supports the proposal to include a substantial site within the Congresbury area in the North Somerset emerging Local Plan.</p> <p>To answer the needs of the local Congresbury area, wider North Somerset area, and surrounding authorities, the joint Spatial Plan is being prepared to provide an updated view on existing and future development requirements. This will cover all requirements envisaged including employment, education, commerce, etc, and predominately residential needs.</p> <p>Considering housing alone, it is thought that to cover the period to 2036, the plan has identified a need for over 100,000 new homes in the area, with over 25,000 of those needed in the North Somerset area alone.</p> <p>Key areas have been proposed for further analysis, identifying probable areas for necessary expansion, along with issues and questions that will need to be clarified and/or resolved. Consequently, in these early stages, the Issues and Options Document has been produced (September 2018), upon which this proposal is being made.</p> <p>The site being proposed is Manor Farm, consisting the main farmhouse and associated detached buildings, along with further acreage attached to the freehold.</p> <p>2.0 Existing Use and Situation</p> <p>In reference to the Issues and Options Document, the Manor Farm site is located in an area designated for the Mendip Spring Garden Village. More specifically, the site is in a location noted as an 'alternative scenario', where development is proposed northwards towards Stock Lane.</p> <p>Currently, the site comprises a sizable main farmhouse, barns and outbuildings, all located on the western edge of the site. The overall site area is almost 10 acres. The aforementioned buildings occupy around 1.4 acres.</p> <p>The site is predominately agricultural, with livestock yard areas to the immediate north of the main farmhouse. Further north and to the east are the undeveloped paddock areas.</p> <p>The site is very well placed off the south eastern site of Congresbury village with the main section of land frontage on Stock Lane, being one of the main tributaries between Congresbury and the A38.</p> <p>3.0 Planning History at Manor Farm</p>	<p>Appendix - Title Plans - Manor Farm.pdf (1.2 MB)</p> <p>Manor Farm - Congresbury -Site Plans.pdf (1.4 MB)</p> <p>A COMPANYING STATEMENT - Manor Farm.pdf (121 KB)</p> <p>call-for-sites-response-form - Manor Farm.pdf (184 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Manor Farm has limited planning history, with only three applications noted on the publicly accessible system. With the most recent proposal uppermost, they are as follows:</p> <p>ID: 13/P/1678/F</p> <p>Erection of a two-storey side and a single-storey side extension Decision: Approve with Conditions Decision Date: 06/11/2013</p> <p>ID: 07/P/0770/F</p> <p>Erection of a garage with office/gym in the roof space and the provision of new access from Brinsea Lane.</p> <p>Decision: Approve with Conditions Decision Date: 17/05/2007</p> <p>ID: 04/P/0136/F</p> <p>Erection of a rear single storey office extension</p> <p>Decision: Approve with Conditions</p> <p>Decision Date: 13/04/2004</p> <p>4.0 Proposed Use and Amounts</p> <p>For the purposes of this report, the proposed use is focused on provision of new dwellings.</p> <p>Outside of the general area appraisal, the site could alone be favourably considered as a viable individual development proposal due to its site area and highway frontages. With 450 linear metres of land facing directly onto the roadside, the site presents opportunities for multiple entrance locations to dissipate traffic from problematic site junctions.</p> <p>The 10-acre site is largely level throughout, thus providing maximum opportunity for efficient use of the site, maximising the available plot numbers.</p> <p>As an initial appraisal using a speculative figure of approximately 35 mixed occupancy dwellings per Hectare, it is thought the site at Manor Farm can offer the following occupation numbers:</p> <ul style="list-style-type: none"> • Use of the whole site including areas currently occupied by the farm house and buildings-140 dwellings • Use of the majority of the site, including areas currently occupied by the outbuildings and farm yard, excluding the main farm house and immediate vicinity-120 dwellings • Use of the majority of the site, excluding areas currently occupied by the main farmhouse, outbuildings and farm yard-105 dwellings <p>5.0 Scale and type of development</p> <p>The above appraisal considers that dwellings will be provided in various occupancy numbers, ranging from small two-bedroom dwellings with a single parking space, through to 4/5 bedroom dwellings with detached garages and additional parking allocation. This appraisal would also consider that small communal amenity areas could also form part of the development.</p> <p>6.0 Appendix</p> <p>Land registry title plans</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The site at Manor Farm is split across 2no. title plans, ST212878 and ST193018, attached as an appendix to the main report. The site sits within OS map tile reference ST4462SE.</p>	
Jan Murray	CALRAG	<p>The document states that <i>“NSC is seeking initial feedback on a range of proposed alternatives.”</i> On the assumption that ‘alternatives’ means alternative SDLs, then this is:</p> <p>2.3.1. Misleading as no alternative SDLs have been identified. The Vale has been ignored (see comments on Green Belt below).</p> <p>2.3.2. It would appear that the SDL submitted to the JSP has been merely split up into one smaller outline with several ‘alternatives’? If this is the meaning of ‘A range of proposed alternatives’ then this is fallacious and misleading.</p>	
Jan Murray	CALRAG	<p>THIS IS A TOTALLY INAPPROPRIATE, UNSUSTAINABLE AND UNDELIVERABLE SDL. We reiterate our total opposition to not only the proposals for Mendip Spring Garden Village (New Town) but also to the Local Plan Issues and Options consultation being carried out before the results of the JSP Public Examination are known.</p> <p>The scale of development is completely inappropriate for a rural area. It is ill thought through, lacks joined-up thinking, needs proper placemaking and planning to create a coordinated approach. NSC has not got the resources needed to ensure a proper new town as described by the pat statements giving the impression of a utopian ‘garden</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>village' (new town almost the size of Wells) can be appropriately delivered. The SDL of Churchill/Mendip Spring is 16 miles from the main source of employment – Bristol or 9 miles from Weston-S-Mare (not 3-4 as indicated in almost every document).</p> <p>The reality is a far cry from even the Garden Village principles as set out in The Town and Country Planning Association's 'Understanding Garden Villages'.</p>	
JLS		It is premature to invite comments on these plans before the next stage of the JSP has reported.	
Mr and Mrs Lait		<p>1 & 2 Further development. Stock Lane may be outside the flood plain on the map at present but there were floods in this area in 2012. The risk of flooding would be an even greater if tarmac and buildings take the place of agricultural land.</p> <p>3 Churchill Gate is already a site of traffic congestion as all the roads leading from this junction are inadequate to take the current usage and 'an additional highway connection' here would lead to even worse back logs. This problem is exasperated in the summer with extra holiday traffic especially if there is a problem on the MS when the whole area is virtually grid locked.</p>	
Simon Hegarty		<p>In planning terms the proposed vision is misconceived by reason of the following:</p> <p>(a) It is undeliverable because: (i) It will not be possible to purchase the necessary land to carry out the development within the time contemplated by the plan and (ii) is dependent on the construction of roads from the M5 motorway requiring government funding which is unlikely in the absence of there being any sound economic case for it.</p> <p>(b) It is not viable because the cost of the necessary infrastructure to support such a large development in the middle of the countryside would be disproportionate and prohibitively high and would made the building of affordable housing in Churchill unviable .</p> <p>(c) It is unsound because(i) There is and will not be sufficient local employment to support the new development (ii) There will be no adequate public transport infrastructure to support the development in consequence of which many more journeys will be made by car in to Bristol (2011 Census Churchill and Lanford - 87% of those who travel to work commute to Bristol.*) (iii) The cost of necessary flood and drainage infrastructure wil preclude the provision of affordable housing.(iv) it is adjacent to the The Mendip Hills AONB.</p> <p>(d) It is unsustainable because the location is too far from employment locations resulting in increased car movement , the lack of an adequate transport infrastructure, the unmitigatable damage to ecology and landscape, and substantial increase in pollution from traffic commuting into and out of Bristol(a City which aspires to be carbon neutral)</p> <p>In summary, the Mendip Spring Garden Village proposal (7.6 of the JSP) will be found to be unsound on public examination due to take place in 2019. The vision for this development is therefore fundamentally flawed.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Terry Harrold		"I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors." ALSO Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) Transport infrastructure is environmentally damaging. Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. Pollution - impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems.	
Tom Leimdorfer		None of these potential scenarios are remotely acceptable. Alternative 1 would result in a settlement separated from the main town by the by-pass; it would be on agricultural land close to but separate from Congresbury and adding to the existing problems of the B3133. Alternative 2 would effectively join the new town to Sandford. In both cases, there would be a totally car-reliant suburban addition to an already predominantly out-commuting town.	
Wessex Water (Ruth Hall)	Wessex Water	Detailed engineering appraisal will be required to consider foul drainage arrangements for proposed development. Options include conveyance of flows to either the Weston super Mare or Wrington sewage treatment catchments. Preference for alternative scenario 1 or 2 will be dependent upon the choice of receiving catchment. Engineering appraisal will attract a fee and can be commissioned as appropriate.	
Wrington Parish Council	Wrington Parish Council	Alternative Scenario 1 – using Stock Lane as northern and eastern boundaries, part of the land is already in use (former mushroom farm), but is possible. Alternative Scenario 2 – Impinges on Churchill Green and would not be very popular. Alternative Scenario 3 – No way. This would be the ruination of Langford.	

Document Part Name

Q18. Are there any other options you would add for accommodating strategic growth at Mendip Spring Garden Village?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alder King (M Cullen)		4.7 As referenced above, growth within the SDL should be channelled eastwards towards Stock Lane and no other options are proposed in response to question 18. The University of Bristol owns significant land holdings immediately to the north of their existing veterinary college which is located off Stock Lane to the east and is the area which the route of the new bypass is shown. Given this land holding is in a single ownership, and is well related to a major employer, it seems sensible to explore incorporating this land into the SDL. Notwithstanding this, land to the south of the SDL is already earmarked to become a Strategic Gap, where the setting of key heritage features need to be safeguarded, and land to the west and north west comprises open countryside, which are also to be protected from future development. Appendix 1 outlines in red the University of Bristol's land holding to the east of the SDL and also encompasses their land ownership within and around their existing veterinary college.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Andrew		The diagrams demonstrate that this is not a suitable location for a large housing estate (it doesn't actually appear to meet the criteria for a Garden Village, in that it would not be capable of independent function). The plans demonstrate that the housing estate would destroy the distinct nature of Congresbury, Churchill and Sandford and result in housing sprawl.	
Avon Wildlife Trust	Avon Wildlife Trust	No comment.	
Blagdon PC	Blagdon Parish Council	We have no specific comments other than there must be close coordination between employment, transport and housing development plans. These should ensure minimum disruption or long term impacts on transport links serving adjacent communities.	
Burrington Parish Council	Burrington Parish Council	The diagrams confirm that this is not an appropriate location for a new Garden Village. There are no options that would make it suitable.	
Congresbury Parish Council	Congresbury Parish Council	This location is in a totally unsustainable site. The options and issue document has not explored other locations to accommodate the growth. The alternative scenario 1 is poor as this will lead to the joining of Congresbury and the new village. This is something that should not happen	
Cresten		This location is unsuitable for strategic development.	
moore@		It is inappropriate for the council to be consulting further on these proposals when there are significant issues that have been raised via the JSP consultation, which is still with the Independent Inspector. Within that I also specifically object to any proposal to create a "Green Village" at Churchill, as there is no way to create a sustainable and economically viable new settlement at this site.	
Mr and Mrs K O'Connor		<p>As part of this representation, the land as outlined on the enclosed Site Location Plan ref. Figure 1 is formally offered for consideration as a residential allocation. Please accept this letter as a representation prepared on behalf of Mr M and Mrs K O'Connor to North Somerset's Consultation to the Draft Local Plan 2036; Issues and Options Stage Document.</p> <p>As part of this representation, the land as outlined on the enclosed plan ref. Figure 1, is offered as a residential allocation; either in its own right or as part of a larger residential allocation. The land is located West of Brinsea Road, Congresbury (345521, 161560), with the nearest post code being BS40 5ET.</p> <p>The land is accessed via Stock Lane to the west. The land is outside of the Area of Outstanding Natural Beauty (AONB), and it does not form part of the Green Belt. The Draft Local Plan 2036: Issues and Options Consultation Document takes forwards the objectives of The West of England Joint Spatial Plan (WoE JSP). The WoE JSP sets out a prospectus for sustainable growth that will help the area meet its housing and transport needs for the next twenty years. It will guide the planning strategies for planning authorities Bristol City, North Somerset, Bath and North East Somerset and South Gloucestershire Councils.</p>	<p>Ben Lewis - Land at Stock Lane- LP Issues and Options Rep.pdf (567 KB)</p> <p>Ben Lewis - Location Plan -Stock Lane Congresbury P0232-48.pdf (1.5 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The JSP has been submitted to the Planning Inspectorate and it is anticipated it will be examined in Autumn/Winter 2018. It is expected to be adopted in 2019. Given its relatively advanced stage towards adoption, it is the guiding strategy for the next North Somerset Local Plan 2036.</p> <p>The 'Issues and Options Document' informs North Somerset's consultation. It proposes a new garden village centrally between Langford and Congresbury which is being referred to as 'Mendip Spring Garden'. The Issues and options Document suggests three alternative scenarios to stimulate discussion on the possible options for accommodating the strategic growth. Alternative Scenario 1 identifies further development to the north east of the strategic allocation of Mendip Springs Garden Village.</p> <p>The land the subject of this representation falls within the area the subject of Alternative Scenario 1 as shown on p.48 of the Issues and Options Consultation Document.</p> <p>The new development of the garden village will provide new shops and schools within walking distance of the site. The site outlined in Figure 1 provides the potential to secure good access links to new infrastructure and services whilst providing residential development close to existing buildings and residential properties. This is not an isolated location and it is not readily seen from the open countryside. The setting of the site is defined by the backdrop of other nearby residential properties, agricultural and industrial buildings.</p> <p>There is a footpath that runs through the site the subject of this representation. There is no reason why, if the remainder of the site were developed for housing, why this footpath could not be properly consolidated as green infrastructure that could be landscaped to form part of a proper walkway and ecological and landscaped corridor.</p> <p>Mr M and Mrs K O'Connor would like to respectfully invite the Authority to consider the site as outlined within the red line on the enclosed plan ref. Figure 1 to be incorporated as / within a residential allocation in the next North Somerset Local Plan 2036.</p>	
S Moore		<p>I do not believe that this is a suitable site for strategic growth. It does not make sense from an environmental, social or economic perspective. The lack of sustainable transport links to employment is a major issue. This site should never have been proposed. It would be much more appropriate to develop land closer to Bristol, including the land parcels in the Green Belt now contained by the South Bristol Link Road.</p>	
Simon Hegarty		<p>In planning terms the proposed vision is misconceived by reason of the following:</p> <p>(a) It is undeliverable because: (i) It will not be possible to purchase the necessary land to carry out the development within the time contemplated by the plan and (ii) is dependent on the construction of roads from the M5 motorway requiring government funding which is unlikely in the absence of there being any sound economic case for it.</p> <p>(b) It is not viable because the cost of the necessary infrastructure to support such a large development in the middle of the countryside would be disproportionate and prohibitively high and would made the building of affordable housing in Churchill unviable .</p> <p>(c) It is unsound because(i) There is and will not be sufficient local employment to support the new development (ii) There will be no adequate public transport infrastructure to support the development in consequence of which many more journeys will be made by car in to Bristol (2011 Census Churchill and Lanford - 87% of those who travel to work commute to Bristol.*) (iii) The cost of necessary flood and drainage infrastructure wil preclude the provision of affordable housing (iv) it is adjacent to the The Mendip Hills AONB.</p> <p>(d) It is unsustainable because the location is too far from employment locations resulting in increased car movement , the lack of an adequate transport infrastructure, the unmitigatable damage to ecology and landscape, and substantial increase in pollution from traffic commuting into and out of Bristol(a City which aspires to be carbon neutral)</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		In summary, the Mendip Spring Garden Village proposal (7.6 of the JSP) will be found to be unsound on public examination due to take place in 2019. The vision for this development is therefore fundamentally flawed.	
Terry Harrold		"I am totally opposed to the proposals for the SDL of Mendip Spring/Churchill. The Local Plan 2036 consultation for Mendip Spring/Churchill Garden Village (4.2) is premature. It is not appropriate for North Somerset Council to conduct a consultation when very significant issues have yet to be addressed through the joint Spatial Plan (JSP) process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination by the Independent Inspectors." ALSO Houses should be built near to the jobs in Bristol. Mendip Spring/Churchill SDL is 15 miles from Bristol (the main source of employment) Transport infrastructure is environmentally damaging. Increased use of cars puts a significant, unnecessary and costly strain on existing transport infrastructure. Pollution - impact of a significant increase in car journeys to and from Bristol where there is a very significant air quality problems.	
Thomas Matthews		You will probably not want to receive these comments on your latest consultation about the 2036 proposals. Basically you are still assuming that the developments on a huge scale will go ahead in the Chuchill/Banwell area and all of your questions take this as the base. I strongly disagree with this assumption and think it is absolute madness to add over 5,000 houses to a location 18 miles from where the bulk of the residents will have their jobs. The provision of a road to get some of them more speedily to the A38 south of the airport will only scratch the surface of the infrastructure needed to get them (and the current commuters) to work in Bristol. I travel in regularly for 9.00 am meetings and already have to leave at 7.30 am to get there on time. The new section of ring road is already log-jammed from the A370 back up to the roundabout on the A38 at that time. Add another 5,000 cars, at least, to this and there will be chaos. You have not listened, and the clear answer is to have the additional housing much closer to Bristol where public transport and other route options exist. This may mean taking some of the green belt away, but this could be offset by extending green belt designation in other parts of North Somerset - especially close to the Mendip Area of Outstanding Natural Beauty. I am hopeful that the JSP examination will address this point and reject your overall conclusions. You are wrong.	
Wrington Parish Council	Wrington Parish Council	No.	

Document Part Name

Q19. Do you have any comments on the proposed vision for Backwell?

Respondent Name	Respondent Organisation	Comment	Attached documents
A Crew		I am writing to strongly object to the Local Plan, specifically the proposed 700 houses at Grove Farm in Backwell and the proposed Metro Bus Link Road envisioned to support this housing. This would have a tremendous impact on Backwell lake; visually, environmentally and ecologically, something I vehemently oppose. In addition, a	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>proposed Transport Hub adjacent to the Rail Station would attract more traffic, necessitating the building of more link roads and completely destroying Backwell's village character.</p>	
A Sturat-Hunt		<p>I find it deeply concerning that NSC is spending so much time, money and effort on it's local plan in advance of any firm conclusion relating to the JSP. This smacks of a council who is not prepared to listen to the views of the resident that actually live in the affected areas and wishes to press on with its half-baked plans regardless. NSC needs to stop and first listen or else run the risk of alienating itself from the very people it is supposed to represent.</p> <p>This consultation process seems so unnecessary and puts all Backwell residents under extreme and undue stress. My reasons for opposing these plans have not changed. I do not wish our village to double in size, I do not want it to become the mass transport hub that is planned, and I do not wish to have a massive new road carved out of the very countryside that drew me to this area in the first place. The knock-on effects will be enormous:</p> <p>The road, the pollution, the added road congestion (which will not be alleviated by any road), the destruction of wildlife habitats, the destruction of the peaceful village we all know and love, a new multi-storey car park, the noise. One can go on and on.</p> <p>My wife and I were drawn to living in Backwell from the city 4 years ago as we wanted to raise our family in a village with a small close community and surrounded on all sides by the countryside. The plans you have proposed seek to undo all that, and I therefore cannot remain silent on the issue, especially when NSC is failing to listen to those who are directly affected by their plans.</p>	
A Sutherland		<p>I find it incredibly premature that NSC are considering this Local Plan in advance of the JSP being looked at. This plan goes totally against the Backwell Neighbourhood Plan of sustainable housing development within the Village. The proposed 700 new homes for Backwell and almost 3000 for Nailsea will have a massive negative impact on these areas. The character of Backwell would change for the worse and could not be able to be considered a village any longer. Appropriate infrastructure is not in place to support this development as there is not enough employment in Backwell and Nailsea and no doubt potential new residents would be travelling to Bristol along an already congested A370 or using the inadequate train service/station. There are not enough services such as doctors, dentists or schools in Backwell to support this new population and I have grave concerns that any developer would end up not including such services even if they were required to do so as part of the contract. The impact on the environment and wildlife would be substantial and once land is lost to housing, species such as Horseshoe bats would never recover. I strongly object to the plan and urge NSC to reconsider decimating Backwell and the surrounding area. Alternative options, such as the Vale, should be considered as it is closer to Bristol and more adequate infrastructure is already in place.</p>	
A Sutherland		<p>I find it incredibly premature that NSC are considering this Local Plan in advance of the JSP being looked at. This plan goes totally against the Backwell Neighbourhood Plan of sustainable housing development within the Village. The proposed 700 new homes for Backwell and almost 3000 for Nailsea will have a massive negative impact on these areas. The character of Backwell would change for the worse and could not be able to be considered a village any longer. Appropriate infrastructure is not in place to support this development as there is not enough employment in Backwell and Nailsea and no doubt potential new residents would be travelling to Bristol along an already congested A370 or using the inadequate train service/station. There are not enough services such as doctors, dentists or schools in Backwell to support this new population and I have grave concerns that any developer would end up not including such services even if they were required to do so as part of the contract. The impact on the environment and wildlife would be substantial and once land is lost to housing, species such as Horseshoe bats would never recover. I strongly object to the plan and urge NSC to reconsider decimating Backwell and the surrounding area. Alternative options, such as the Vale, should be considered as it is closer to Bristol and more adequate infrastructure is already in place.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
A. James		<p>It is unexpected and premature, to say the least, that North Somerset Council should be spending time and money considering this Local Plan in advance of the JSP even being looked at and inspected next year. The proposals to increase the size of Backwell by almost double in one foul swoop are completely unsustainable and reckless. The Local Plan is a wordy document written in council speak which means little to most people. What it will mean, if implemented, is that</p> <ul style="list-style-type: none"> • Backwell will no longer be a Village but a Transport Hub (as suggested in the Plan), serving the Motorway (M5 at J19/20) and surrounding areas, with more traffic, more pollution and 700 more houses, all vying for position on the already congested A370. • North Somerset Council seem happy to propose "Tinkering" with the Green Belt in Villages like Backwell, but yet refuse to consider ALL options within their control. They are prepared to see a Link Road next to Backwell Lake, linking traffic (including Metro Bus) to Clevedon and the Motorway. Another Link Road (including Metro Bus) crossing unstable moorland, greenbelt and agricultural land on to one of the most ancient parts of Backwell at Backwell Common. A road crossing over or under the railway line and emerging next to Flax Bourton & Backwell Cricket Club, opposite Stancombe Quarry, which already has hundreds of lorries emerging every day. • Expanding the Car Park at Nailsea & Backwell Train Station with a Multi Level Car Park, in effect turning the Train Station and our Village in to a "Park and Ride". The Local Plan talks about supporting and enhancing the Village Centre and addressing traffic issues on the A370, yet there is no substance or costings for any of this, indeed building more roads and more houses, will only add to the problem, and how does any of this enhance the Centre of our Village?. • North Somerset Council seem to think that the Village of Backwell has sufficient employment and services, such as Doctors and Dentist etc to support thousands of extra people, yet the reality we know will be that the vast majority will commute in to Bristol, (particularly if the linked transport document which suggests closing Station Road under the Railway bridge is implemented!), and what of local services?. • Backwell is a Village, it has a Village Neighbourhood plan, which has looked carefully at sustainable growth, which is in proportion to the Village, 100 new houses all given planning, all planned, all costed, all sustainable, all proportionate to the size of Backwell. Your Local Plan or "Issues and Options" document does indeed have a number of "Issues", which I object to in the strongest possible terms. 	
Alex		see below	
Ali		<p>Unsure whether this really is a consultation?</p> <p>For Backwell. Doubling the population, a massive road, destruction of wildlife, noise, a multistory carpark. Backwell appears to be paying an extremely high price and taking on a lot of heavy lifting in terms of traffic and building.</p> <ul style="list-style-type: none"> • 700 Houses on Grove Farm doubling our population • Car Park Expansion at Nailsea & Backwell Train Station • Park & Ride for Trains and Metrobus • Backwell becoming a "Transport Hub" serving a much wider area • A Link Road and Metro Bus (lite) Road linking the Nailsea SW development to Backwell and eventually going on to the M5 at Clevedon • Road running next to Backwell Lake and out onto Station Road. Bringing traffic in from the Motorway and surrounding areas • A New access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell. • New access roads at Rodney Road and Moor Lane on to Grove Farm • New roads linking Nailsea. (depending on where Nailsea's 3,200 new houses are allocated). • Stress and extinction of some of our local wildlife including bats, Kingfishers, Otters etc 	
alsymo		<p>Big mistake losing more green spaces, they are disappearing fast just when it's so important to keep global warming down to a minimum. This would make Backwell into a sprawling town with too many people for the village facilities to cope. Traffic through Backwell is bad enough now without adding even more to it. The Vale would be a far more sensible place to build houses, being near to Bristol with shorter journeys to and from the city!</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
AM		<p>Before starting I should address the (perhaps inevitable) suggestion that my objections amount to ‘NIMBYism’ or is an attempt to protect the value in my own property. My house in Backwell would not be directly affected by the proposed development as it is on the other side of the A370 from Grove Farm. However, my family loves Backwell and loves living here and I feel that these proposals will have an enormous detrimental impact on the village as a whole, while not solving the problems that the Local Plan seeks to address. Therefore I remain strongly opposed to the proposals even though the direct impact on my own property is limited. Also, Backwell has sought to embrace the clear need for more houses, adopting a Neighbourhood Plan which accepts that there should be development in the village, albeit on a scale which can be absorbed without causing irreparable damage to the existing village community, services and environment. It seems slightly hypocritical for North Somerset Council and WECA to praise Backwell for being so forward thinking in adopting a Neighbourhood Plan, only to then seek to ignore that plan and the wishes of the local residents.</p> <p>My first observation would be that the Local Plan proposals in relation to Backwell are extremely premature, given that the draft JSP is currently only at examination stage and you will be aware that there was widespread and well-reasoned local opposition to both the proposal to build a further 700 dwellings at Grove Farm and the proposal to build a new A370 link across Backwell Common. Similarly, there has been widespread opposition to the proposal to build more than 3000 houses in Nailsea. The Council’s decision to press on with consultation on both, highly controversial, aspects of the JSP at a time when examination of the JSP has not taken place, suggests that the Council is either paying no regard to local views on these issues or intends to present the development as a ‘fait accompli’ regardless of the outcome of the JSP examination. Either way, the process appears not to pay any due regard to the views and opinions of the local population.</p> <p>Process aside, I would also like to register my opposition to the proposals to build 700 houses on the edge of Backwell and in relation to the proposed link road. Both proposals appear ill thought-out, do not pay regard to the Backwell Neighbourhood Plan and, critically, appear to fail to meet the requirements for Sustainable Development as set out within the consultation document. Although the criticisms raised in the JSP consultation are noted in part 4.3 of the local plan consultation paper, nothing new appears to have been proposed to deal with the very real concerns which have been raised in respect of the impact of the proposed development on village amenities, transport systems, flooding, local environment and the general cohesion of the village.</p> <p>No thought appears to have been given to the impact that approximately 1400 further adults (plus children) will have on delivery of local services. At present, there is already extreme strain on the local GP practice, no NHS dental provision and the schools are over-subscribed. Adding this number of new residents without any provision for additional healthcare appears to be short-sighted at best. While I note the proposal to build a new primary school I note the concerns raised by the Residents Association about the fragmentation of primary school provision and there do not appear to be any proposals in relation to Backwell School – also, what proposals are being made for the children who currently come to the Backwell schools from surrounding communities – if the catchment shrinks (which it inevitably will), what provision would be made for these children in the future? Aside from the specifics of healthcare and education, the addition of so many new residents is also likely to have a detrimental impact on the leisure centre (assuming the Council does not close this!), retail space, village halls etc – again there do not appear to be any proposals to expand the provision of such services. No allocation of additional housing should be made without concrete proposals to meet all of the above issues before any construction of new houses is contemplated.</p> <p>A further significant concern relates to transport. There is very little local employment in Nailsea and Backwell. This means that almost everyone who moves into new houses in Backwell will be commuting to Bristol or to Aztec West and the other employment centres around the city. This is going to result in a significant increase in car traffic, both at commuter times and more generally as well as increased demand for what is already a chronically over-used train line. I note the proposals to turn the station into a ‘transport hub’ but measures to improve access and car parking at the station (or even to extend the platform) are worth very little unless there is an increase in both the frequency and capacity of the trains calling at Nailsea and Backwell. There is no discussion of how this would be achieved as this will presumably require collective action with both First Great Western and Network Rail – until concrete proposals are set out in this respect, any aspirations for improved services from the station are pure conjecture.</p> <p>The situation in relation to the roads is even more troubling. I commute into Bristol by both rail and car and the A370 route into Bristol is highly congested even on quiet days. Adding another 700+ cars to the existing situation is just going to make this worse. The link road proposal appears to add little, given that the existing bottle-neck is the roundabout between the A370 and the South Bristol link road (in indeed the gridlock then stretching into Bristol) – running another road into the A370 at Flax Bourton will just add more cars to the existing gridlock – meaning we will have torn up historic farmland and wildlife habitat to achieve precisely nothing. The only realistic solution to this issue would be to build the new houses in the Vale where they already have access to the Metrobus system and other local public transport leading into Bristol (or indeed can easily cycle into the city).</p>	

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		<p>The proposal to build 700 houses and the link road will also be a disaster for local wildlife and the environment. The impact on Backwell lake with its wild bird and otter populations would be drastic. So would the loss of farmland around Grove Farm, which supports a well-established population of bats as well as other wildlife. The concreting over of this area also appears likely to have a detrimental impact on both the green aspect and the air in West Town, something which we will regret once it is gone. The building of houses and a road in this area also seems extremely short-sighted given that they are on a flood plain, something which is presumably likely to become more of a risk factor over time. I would also question whether building a new road across a flood plain is an optimal use of public money as there will presumably have to be further engineering provision made to avoid the road being damaged or closed by future flooding?</p> <p>Finally, the proposals amount to increasing the size of Backwell by nearly 50%. This will almost inevitably change the feeling and closeness of the village – in fact, could it even be called a village at all if these houses are built? Backwell’s community spirit is one of the things which makes it special and something which attracted many of the current residents. Unilaterally changing this without regard to the clearly expressed views of the existing residents would be regrettable and is presumably something which an elected body would be loath to do, given that its power is only derived from the democratic will of its population?</p> <p>Taking all of the above into account I do not consider that the current proposals in the draft Local Plan meet the objectives the Council has set itself. Building this number of houses in Backwell will only lead to further infrastructure issues which the Council will have to then solve in the future, potentially at significant cost. I would suggest that a better solution for North Somerset would be to focus development around Weston and the Bristol fringe where the houses are located as close as possible to the jobs of their residents and where existing local infrastructure is more developed and accessible. This solution would be far more sustainable and would presumably come at much lower cost for the Council and for the related public bodies who would have to find solutions to the infrastructure issues.</p>	
Andrew Morley		<p>The fact that you (NSC) are spending a lot of money on this local plan before the JSP has even been considered this matter seems unacceptable. I understood North Somerset Council to be cash strapped, but this does not seem the case. Older Backwell Residents are going without the adequate health and social care to meet their needs, school budgets have been slashed so therefore it is very surprising NSC can find the resources to compile the local plan.</p> <p>As well as the lack of resources available to North Somerset residents,</p> <p>For Backwell. A massive road, destruction of wildlife, noise, light pollution, a multistory carpark again seems totally unacceptable..</p> <p>It would seem that Backwell and the local area would be paying an extremely high price. Taking on a lot of heavy lifting in terms of traffic and building. It basically means that we won't exist as a local community anymore. Below is a very short list of the issues.</p> <ul style="list-style-type: none"> ○ 700 Houses on Grove Farm doubling our population • Car Park Expansion at Nailsea & Backwell Train Station • Park & Ride for Trains and Metrobus • Backwell becoming a “Transport Hub” serving a much wider area • A link road and Metro Bus road linking the Nailsea SW development to Backwell and eventually going on to the M5 at Clevedon • Road running next to Backwell Lake and out onto Station Road, bringing traffic in from the Motorway and surrounding areas • A new access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell. • New access roads at Rodney Road and Moor Lane on to Grove Farm 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • Noise • Light pollution <ul style="list-style-type: none"> ○ • Stress and extinction of some of our local wildlife including bats, Kingfishers, Otters e • An increase in air pollution in the local area, cause by increase in traffic and loss of green habitat. <p>We do not feel this plan is sustainable.</p>	
Andrew Morris		<p>Objection due to adverse impact on existing roads and services and direct damage to the environment</p> <p>I wish to object to the Local Plan (specifically regarding the proposed additional 700 homes in Backwell) on the following basis:</p> <ul style="list-style-type: none"> • Backwell's streets and roads are wholly inadequate for the current volume of traffic currently using them. Station Road barely copes. Recent traffic calming measures in Station Rd have improved the speed and noise but a further (potentially) 1000 vehicles would render it impassable. The A370 is severely congested during peak hour in both morning and afternoon. Moor Lane is almost as bad and is basically a single lane due to existing residents parking on roadside. • There is no proposal for any increase in services and amenities; I believe that schools and doctors etc would not cope with the increase in population and associated traffic – without major investment • There is minimal employment in Backwell or Nailsea. New residents would generally commute to Bristol. Why isn't this development proposed for Ashton Vale where Green Belt has already been compromised by the south Bristol Link and where there is employment within walking distance and adequate space to build new schools etc. • The proposed transport infrastructure is not a commitment but a long-term goal. The current link roads, trains and buses are over loaded and would choke with the proposed plan. • Backwell & Nailsea are surrounded by greenbelt and have major structural and environmental issues associated with a development of this size – notably flooding • The proposed development will impact on the foraging zone of the bat colony in Brockley which I believe is a very important maternal roost. • Additionally, this development will directly result in destruction of a significant amount of habitat through loss of hedgerows and fields 	
Andrew Woodgate		<p>I am objecting to your plans for Backwell and Nailsea which you have put forward with little or no regard to the people who reside here or to the obvious alternative that already partially exists.</p> <p>To make a small village like Backwell become a transport hub is to destroy the very nature of the area and, it seems to me is ill-thought out. Surely a more likely place for a transport hub is Bristol Airport which is crying out for a better link to the Bristol infrastructure of Temple Meads and the M4/5 and a more obvious Metro Bus line. It is also</p>	

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		<p>far less intrusive on the lives of people in the area. I find it bizarre in the extreme that you would prefer to have yet another blot on the North Somerset landscape when there is already an existing one that can be slightly, in comparison, expanded.</p> <p>I find your decisions to:</p> <ul style="list-style-type: none"> - Carve through Backwell with a major road, a motorway link, - Carve through Backwell with a 'metro bus' route (which will no doubt be as wasteful as the new empty one already built in Ashton) - Build a multi storey car park right next to a local beauty spot and leisure area. - Build 700 houses thus doubling the size of a small and close community village. - Designate a whole village, with a major and successful school, to be a Transport Hub. <p>Are you all that insensitive or is it that none of you live in this area? Can you not see what a road coming straight through Backwell, across Backwell Common and off through Flax Bourton will do to the area? You act as if 'Transport Hub' is some sort of honour, a medal to be proudly worn.</p> <p>Please rethink this unpleasant scheme and stop wasting tax payer's money on further development of it. Think logically.</p>	
Andy	Mr	<p>I suspect that a great proportion of those objecting to building on green belt land are living in homes that are sited on what was, quite recently, green belt land. Backwell, for example, is not a picture-postcard village offering peace and serenity to all inhabitants, but a relatively recent development of the original small community. Like it or not communities have to be developed and not wrapped in cotton wool.</p>	
Anne Morley		<p>I understood North Somerset Council to be cash strapped, but this does not seem the case. Older residents are going without adequate health and social care to meet their needs, school budgets have been slashed so therefore it is very surprising NSC can find the resources to compile the local plan. The fact that NSC are spending a lot of money on this local plan before the JSP has even been considered this matter seems unacceptable.</p> <p>As well as the lack of resources available to North Somerset residents,</p> <p>For Backwell. A massive road, destruction of wildlife, noise, light pollution, a multistorey carpark and significant air pollution for the future seems totally unacceptable..</p> <p>It would seem that Backwell and the local area would be paying an extremely high price. Taking on a lot of the burden in terms of traffic and building.</p> <p>Below is a very short list of the issues.</p> <ul style="list-style-type: none"> ○ 700 Houses on Grove Farm doubling our population • Car Park Expansion at Nailsea & Backwell Train Station • Park & Ride for Trains and Metrobus • Backwell becoming a "Transport Hub" serving a much wider area • A link road and Metro Bus road linking the Nailsea SW development to Backwell and eventually going on to the M5 at 	

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		<p>Clevedon</p> <ul style="list-style-type: none"> • Road running next to Backwell Lake and out onto Station Road, bringing traffic in from the Motorway and surrounding areas • A new access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell. • New access roads at Rodney Road and Moor Lane on to Grove Farm • Noise • Light pollution <ul style="list-style-type: none"> ○ • Stress and extinction of some of our local wildlife including bats, Kingfishers, Otters e • An increase in air pollution in the local area, cause by increase in traffic and loss of green habitat. <p>This feels totally unacceptable and not in keeping with the views of local residents and consistents.</p>	
Annoyed of Backwell		<p>The JSP has identified Backwell as suitable to take a strategic housing development of 700 houses. The extensive infrastructure requirements are not sustainable nor in my opinion affordable.</p> <p>Such an increase in housing numbers will destroy the feel of the village and put an intolerable strain on the few local facilities that we have - doctors, dentists etc.</p> <p>There is no evidence that the JSP can (or perhaps more importantly will) deliver any infrastructure to manage the already congested roads, poor railway service, poor bus service. The estimated cost in terms of money, never mind environmental impact, cannot be justified when there is the option of The Vale which is closer to Bristol and already has the transport links necessary.</p> <p>There is mention of closing Station Road to general traffic at the railway bridge. The A370 junction with Station Road is already recognised as a bottleneck. What benefit would such a closure bring to the area apart from causing havoc on the surrounding lanes - it effectively cuts Backwell off from Nailsea and its services.</p> <p>Mu understanding is that the development is proposed on good quality agricultural land (I have seen the many crops prosper on Grove Farm) and a loss of valuable food producing land seems to have been overlooked in the JSP. In addition, whilst I'm no expert, I am told that there are protected species of bats inhabiting/using the land.</p>	
Aston	Aston and Co UK	<p>Development at the existing larger settlements is more sustainable and more rapidly deliverable than the Garden Village proposals. The proposed new road to access from the A370 to Station Road will open that land for development but without a radically improved public rapid transportation system congestion will be increased.</p> <p>Live-Work units that make use of the roll out of fibre to the premises and produce opportunities for small scale business start-up without creating outward commuting should be utilised.</p> <p>Local Employment land integrated and well connected with new housing is essential to reduce out commuting.</p> <p>Infrastructure Investment must be implemented ahead of new housing.</p> <p>Connectivity of new housing to the station by effective frequent green public transport is essential.</p>	

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Avon Wildlife Trust	Avon Wildlife Trust	We suggest that the vision for Backwell should acknowledge the ecological sensitivity of the area and explicitly state that the proposed development will delivery net ecological gain.	
B Marshall		<p>The NSC local plan has failed to take into account views held by local residents on their own Neighbourhood plan but seems to have adopted the working proposals by the JSP. This consultation is premature and inappropriate given that the JSP Independent Inspection has not taken place. The scale of the proposed developments at Backwell are completely inappropriate given the current size of the village and existing infrastructure.</p> <p>Therefore I must object in all respects about the proposal for a village extension that in truth increases the size of Backwell by over 40% and will be of detrimental effect change the nature of the community forever.</p> <p>Housing & unaffordable infrastructure on a flood plain which is greenbelt and rich agricultural land is impractical. The transport plans would exacerbate the traffic issues and are undeliverable and unsustainable.</p> <p>I'm saddened that in addition to adopting unrealistic housing need projections that NSC hands over land and assets to the JSP without seemingly any creative alternatives.</p> <p>Politically I have lost faith in NSC</p>	
backwell		<p>I wish to make comments on the Local Plan 2036. I note in the preamble: that the Spatial Strategy has to “command a high degree of public support and is a highly sustainable element of the strategy”. My assumption is that if there is not a ‘high degree of support’ – the Spatial Strategy must be revised.</p> <p>The emerging strategy- Making the most of sustainable locations (especially near public transport hubs). This is a key statement – by definition then, a sustainable location must be near a public transport hub</p> <p>Backwell</p> <p>I do not agree with the proposals for Backwell. Backwell is designated as a “Service Village” and the plan states “Service Villages are locations for small scale development of an appropriate scale either within or abutting the settlement boundary.”</p> <p>I note.</p> <p>“5. Both the government and the council attach great importance to the Green Belt and no strategic changes to accommodate large scale housing proposals are being put forward in this Plan.”</p> <p>700 additional homes on Green Belt land that will raise the housing population by some 40% cannot be called ‘small scale’? On the Plans own definitions and the government’s desire to maintain Green Belt land, the development is inappropriate and unsustainable. Backwell Village centre is already overcrowded. Parking is at a premium on Rodney Road as the main shopping area of the Village. Any further expansion will bring this area to a halt.</p> <p>It is hard to believe the Plan’s statement - “Backwell will remain an attractive and vibrant village set on the edge of the Green Belt” It will not be either attractive or small.</p>	

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		<p>Whilst seemingly attractive, the development of Nailsea & Backwell railway station as a transport hub with car park expansion will be a magnet drawing even more traffic into Backwell from the surrounding areas. It is probably cheaper and easier to drive to the hub than try to take public transport from Weston, Clevedon or Portishead for example, let alone the villages in between. Already, the side roads are packed with commuter cars rather than pay for parking at the station.</p> <p>A road link from the hub to A370 at Farleigh will cross a water meadow that provides a strategic gap between Nailsea and Backwell. That cannot be a sensible suggestion and will have a detrimental impact on Backwell . Common. All it will do is bring further congestion onto the A370 which already backs up at the new South Bristol Link Road.</p> <p>Any change to Station Road access from Backwell to Nailsea will harshly affect residents between the 2 villages and cannot be justified. If it were to happen, then side roads will be used as the 'by pass'. All these roads already suffer from 'rat runs' when main roads and motorways jam.</p>	
Backwell Parish Council	Backwell Parish Council	<p>Backwell Parish Council is grateful for the chance to respond to this consultation. We are doing so in two parts:</p> <ol style="list-style-type: none"> 1. This letter taking a high-level response to the principles / overview. 2. A more detailed point by point response which will be submitted later under separate cover. <p>Each of our two responses should be read with knowledge of the other.</p> <p>To avoid repetition, we will assume the reader is fully aware of our responses to the Joint Spatial Plan (JSP) and the Generating Ideas consultations. There are major problems with the Issues and Options document, which are outlined below:</p> <ul style="list-style-type: none"> • Premature <p>We consider the JSP to be an unsound document and have said so in our responses. The Issues and Options document is predicated on the JSP being accepted in its current form and, while we understand the reasons for that, this makes your document premature.</p> <ul style="list-style-type: none"> • Speculative <p>The estimated costs of the infrastructure required to deliver the 700 houses in Backwell (and the huge development in Nailsea) have not been published. Since there is no indication of where such funds would come from or whether they will be available, this speculative document is causing anxiety to our residents by threatening a treasured local amenity (including the important "Strategic Gap" from Nailsea) without any indication of how this would be delivered. Taking the example of a road close to Backwell Lake, the very wet flood-plain area means the infrastructural costs would be substantial.</p> <p>The absence of identified sources of funding, the inability of the developers to fund these works in totality, and the likelihood of costs escalating when site specific issues, engineering solutions are factored in, puts into question the ability to deliver housing sustainably in this area.</p> <ul style="list-style-type: none"> • Transport <p>A key point is that the existing transport infrastructure at Backwell would be unable to support the delivery of 700 homes, even with local road improvements. Notwithstanding our objections to these proposals in principle, delivery of this number of dwellings at Backwell would require significant enhancements to the highway</p>	<p>Issues and Options Response Letter.docx (90 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>network and community infrastructure in order to achieve a sustainable form of development. The JSP must address these issues directly to ensure that any allocation brought forward through the new Local Plan to 2036 is capable of delivering sustainable housing, supported by the timely delivery of adequate infrastructure. Based on the current JSP and Issues and Options papers, these transport issues are unresolved and therefore the strategic allocation at Backwell is perverse.</p> <ul style="list-style-type: none"> • Conflict with other policies: <p>Settlement Hierarchy</p> <p>Backwell (a service village), has been identified as suitable for a SDL of 700 houses. But the North Somerset policies include: <i>'The service villages are identified as locations for small scale settlements.....'</i> and clearly this proposal is not a small-scale development.</p> <p>Sustainability</p> <p>Backwell has been identified in a NSC document as the most 'sustainable' of all North Somerset's villages. However, the developments, as proposed in the Issues and Options document would so dramatically alter the village that it would no longer enjoy the community traits that made it sustainable. Thus, the plan is self-defeating of the policy of being sustainable.</p> <ul style="list-style-type: none"> • Fails to adequately assess and describe other options <p>Other much more suitable sites for the SDL are well known to us and so presumably North Somerset Council. Some are closer to Bristol with much fewer transport problems and lower infrastructure costs.</p> <ul style="list-style-type: none"> • Anxiety making <p>This document is unwise because it is generating a lot of anxiety amongst our residents BEFORE the big issues have been thought out and resolved.</p>	
Backwell Parish Council	Backwell Parish Council	<p><u>SECTION 4.3: BACKWELL (pages 50 - 53)</u></p> <p>The future of Backwell is understandably at the heart of BPC's representations. We welcome recognition that any strategic scale development would need to be sensitively designed to integrate into the village and be appropriate to its rural setting. BPC has fundamental concerns regarding the suitability of land west of Backwell to accommodate the scale of development envisaged by the JSP. If after examination of the JSP, the SDL is committed the provision of effective and timely transport improvements which are capable of mitigating the adverse impacts of the proposals upon the A370 and local road network will be vital. The Issues and Options paper also recognises the ecologically sensitive nature of the site, as a critical foraging ground with numerous flight paths for the greater and lesser horseshoe bats. If the land is found to be suitable for allocation, robust mitigation will be necessary to safeguard the integrity of the SAC and the integral SSSI at Brockley Hall Stables.</p>	
Backwell Parish Council	Backwell Parish Council	<p>Proposed Vision for Development (Pages 50-52):</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>As outlined above, BPC is sceptical of the potential for planned road improvements to “relieve pressure on Backwell Crossroads and Station Road”. In the absence of feasible options for vehicular access from the SDL to the Station or the new roads, all residents of the new SDL would need to travel along the A370 and Station Road to access Bristol, Nailsea and the new road infrastructure. The new road infrastructure benefits Nailsea residents by providing a more direct link to the A370 towards Bristol but it does not mitigate the significant adverse impact of increased vehicular movements on the A370 generated by the Backwell SDL. In the absence of a suitable infrastructure solution to achieve sustainable development at Backwell, the proposed SDL is unsustainable.</p> <p>Notwithstanding the above, should the SDL be allocated, BPC supports the principles for development outlined at page 51. The early delivery of the New Station Road in advance of the development commencing, coupled with modifications to Station Road should be a prerequisite to development of both Nailsea and Backwell SDLs, although we are not convinced this would mitigate the traffic from the Backwell SDL.</p> <p>The proposed layout of the development should respect the West Town Conservation Area and the setting of Grove Farm and also prevent the incursion of development further west towards Chelvey. The retention of historic hedgerows is welcomed to preserve the character of the area and should be promoted to benefit biodiversity. Reference is made to “wider strategic mitigation” for ecology but it is unclear how this would be delivered in practice if this would involve land outside the applicant’s control.</p> <p>Finally, reference is made to the provision of a new primary school to form a “focal point” to the development offering safe and convenient walking routes to surrounding development. BPC supports the provision of additional school places to ensure adequate school places are available within the village. However, with a secondary school, juniors, infants and independent school already within the village, the provision of a fifth school could exacerbate traffic congestion at peak times without careful consideration to its siting in relation to existing residents and safe routes to school. Expansion of existing schools could be more sensible.</p> <p>In addition to the principles set out, two additional points must be considered in the development of the Local Plan – Flooding and Air-pollution.</p> <p>Flooding: As shown in the national flood risk maps and records (https://flood-warning-information.service.gov.uk/long-term-flood-risk/map) there is regular surface water flooding in this area, especially in the Backwell Common and along the A370 (leading to road-closure) but also in the Grove Farm area. The North Somerset Levels Internal Drainage Board has recently stated that a major breach of the backs of the Land Yeo at Backwell could result in the diversion of the extensive upstream catchment into the vestigial River Kenn, to follow what is believed to be its historic route to the south of Nailsea. This area has been extensively drained over centuries and the natural rivers diverted. Climate change and increased flooding is likely to over-whelm those historic earthworks and, without substantial investment, problems can be expected for example in the areas between Nailsea and Backwell close to the location of the MetroBus service and roads. Very significant funds will need to be allocated to avoid those risks if for example a road it to be located between Backwell and Nailsea.</p> <p>Air-pollution: Air pollution is already a concern when the traffic through our village is stationary or slow-moving. Nitrogen dioxide levels have already been monitored by North Somerset and reported in the North Somerset Air Quality Annual Status Report 2018 shows (for example January 2018 in Table B:1 Appendix B) that at times NO2 levels are above 40 micrograms/m3. Obviously, the proposed SDL to the West of Backwell would risk making traffic and air-pollution worse.</p>	
backwellresidents	Backwell Residents Association	<p>At page 29 of the Issues and Options Paper it states that <i>“at this stage the specific boundaries of the development are not confirmed...the potential capacity of the locations will vary in relation to the extent of developable land identified and assumptions about densities.”</i></p> <p>BRA notes that the West of Backwell SDL as identified within the JSP covers a significant area of land controlled by Taylor Wimpey at Grove Farm. It is understood that Taylor Wimpey does not control the land occupied by the farm buildings at Grove Farm which lie in a central location within the potential future housing site. Should the Backwell SDL be confirmed through the JSP, BRA questions the future role and function of the farm building complex when surrounded by new housing. The Local Plan should consider the implications of the retained buildings and potential operations, in close proximity to new housing and the potential future use of the land and buildings, in the event current uses cease to operate.</p>	
Blagdon PC	Blagdon Parish Council	We support the vision but remain sceptical about the ability to deliver it in a timely and economic fashion.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>We have yet to see any proposals regarding timescales or phasing.</p> <p>We are concerned about the level and duration of upheaval that will be created over the development period, particularly if road and transport infrastructure is not prioritised over housing and business development.</p>	
Bridget Petty		<p>I would like to support the comments made by Backwell Parish Council. Their detailed response, articulates my concerns around:</p> <p>Timing of this document and how it works alongside the JSP</p> <p>Concern around impact on the village of Backwell</p> <p>Concern about whether solutions to transport changes will adequately mitigate the impact on the A370 and surrounding roads.</p> <p>Whether the proposed site for 700 is well considered, given environmental criteria, and the protection of important species (horseshoe bats).</p>	
Bridget Petty		<p>I am against a development of 700 houses on the edge of Backwell. It is too many homes and would negatively impact the village. I am not convinced that the proposed transport strategy would relieve the congestion.</p>	
British Horse Society	British Horse Society	<p>BHS comments here are similar. There is a good bridleway network on Backwell Hill but it is difficult to access due to the problems crossing the busy A370. The same goes for the network of bridleways on Cleeve Hill. Consequently, much care should be given to infrastructure that will allow all vulnerable road users to cross the A370 and access that network. At the same time, any new walking/cycling paths should be dedicated as multi-user to ensure maximum use – and safety. Particular care should be made to ensure that new build areas are linked also to the Festival Way path through to Bristol. This will also help to encourage more people to use it.</p>	
Brockley Parish Council	Brockley Parish Council	<p>The JSP is flawed. See Q3.</p> <p>We agree with critical issues raised through consultation. In addition:</p> <p>A. Funding for new transport infrastructure is in doubt, leading to a risk that development will occur without adequate infrastructure.</p> <p>B. Backwell will become a town and probably a dormitory for Bristol and Weston super Mare leading to a large increase in car use.</p> <p>C. Retention of key plots and hedgerows will be eroded over time.</p> <p>D. The proximity of suburban development to Chelvey will risk seeing Chelvey lose its unspoilt openness and will completely change the ambience of this rural hamlet.</p> <p>E. Mitigation of the reduction in foraging area for the greater horseshoe bat is a pipe dream. The evidence shows that the recent changes to the local environment has already had a detrimental effect on their ability to forage locally to the maternity site at Brockley Hall. (There is evidence presented in the English Nature radio tracking report that habitat destruction to the west of Brockley has already negatively affected the Brockley Hall bats (Paragraph 6.0 Discussion: Foraging distances)).</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>F. A link from the M5 to the A370 will mean increased traffic using Brockley Combe.</p> <p>G. The proposed park and ride at Backwell and Nailsea rail station and Metro Bus stop will increase the amount of traffic using local narrow roads and will contribute to the urbanisation of this part of North Somerset.</p>	
C Allsop		<p>Since the Parish Council already has a Local Plan which includes sustainable development which is ongoing around the village, I strongly disagree with the principles set out for Backwell. Basically, with the added substantial development proposed for Nailsea, this village will become a big sprawl with Nailsea with substantially diminished quality of life, not only for the existing residents, but also for the people joining the communities in the proposed development. Further, I and you should question the numbers of new homes required by the government as I recently read that the government has vastly overstated how many homes are needed. This need to be looked at before entire semi-rural areas and villages are destroyed. The North Somerset Council needs to consider again development in the Vale which is next to Bristol since the transport hubs are already there and new residents will have better access to their jobs, etc. I would really like to know why the Vale appears to be sacrosanct, whereas our Green Belt areas and green areas are fair game for the Council and the Planners.</p> <p>It will be very difficult, if not impossible to accommodate the proposed growth in both Backwell (and Nailsea and all the other villages which rely upon both the A 370 and the A38). Also as with most modern developments, the developers maximize profit over providing larger "starter" homes with more space between them and larger gardens, not to mention adequate parking. Wherever we see new developments, there is higher density living more in keeping with a city environment and which is incongruous with our semi-rural village. During the consultation of the JSP, I hope that the officials examining these proposals are apprised of Backwell's strong community wide opposition for very strong reasons.</p>	
C M Pratt		<p>I have read the above and attended the workshop held in Backwell last month.</p> <p>I would like to make the following observations: these are neither in detail nor written with any professional expertise. The points are simply my considered opinion.</p> <p>Transport infrastructure.</p> <ol style="list-style-type: none"> 1. This is very weak in the presentation and appears to me to be a 'vague suggestion'. 2. The closing of the Nailsea Backwell road at the Railway Station will cause real problems . 3. The idea of crossing the railway does indeed solve b) but should be treated as a part of a new transport infrastructure plan that avoids the entire A370 from Cleeve to the Long Ashton bypass. 4. I cannot see the cost of the above being met by NS or Central Government 5. I agree that a viable metro link would thus solve c) but again where are the funds going to come from. 6. Construction of 700 dwellings at Grove Farm will put a huge amount of construction traffic onto the A370 adding to the already high congestion – not only at commuter times. 7. I am also of the view that Bristol Airport's ambitions should be brought into the equation – their aspirations could well resolve some of the above issues. 8. IN CONCLUSION BEFORE ANY DEVELOPMENT COMMENCES THE TRANSPORT INFRASTRUCTURE MUST PRECEDE IT ON A COMMENSURATE SCALE. <p>1. However, thinking outside the box, a metro link that served Backwell, Nailsea and Bristol inbound traffic with a substantial carpark PLUS a congestion charge immediately after the new link road roundabout and into Bristol would relieve congestion.</p>	

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		<p>2. A modern Community Centre needs to be provided for Backwell – as part of a s.106? – as current facilities are already both aging and in many cases oversubscribed.</p>	
Charlotte Ball		<p>An increase in housing numbers of 40% is unsustainable and likely to change the very nature of the village of Backwell. It would put huge strain on facilities such as medical services, drainage, etc., as well as infrastructure which would require an enormous amount of money to sustain such an increase in population.</p> <p>The JSP makes very little attempt to explain how this demand for infrastructure will be dealt with and paid for. The proposals are vague, poorly researched and the cost, to include construction and mitigate for flood prevention, is entirely prohibitive. In addition, the environmental damage to the green belt around Backwell Common, as well as the protected area around Backwell Lake, would be huge. These areas are popular with walkers and cyclists trying to escape the busy roads and improve their mental and physical health. The addition of more roads and the accompanying pollution is not a reasonable pay-off for additional housing.</p> <p>In terms of car users, there would be very little marginal gain for the commuters who would take this route as they would still be affected by, and would make worse, the bottle neck onto the A370 into Bristol. The avoidance of this bottle neck would then cause chaos around the surrounding lanes as the increased traffic from the new houses attempt to commute into the city. There no research or evidence on the JSP as to how many of the inhabitants of the 700 houses would work locally or use public transport.</p>	
Chris R		<p>It is outrageous and premature to say the least, that North Somerset Council should be spending time and money considering this Local Plan in advance of the JSP even being looked at and inspected next year. The proposals to increase the size of Backwell by almost double in one foul swoop are completely unsustainable and reckless. What the Local Plan will mean, if implemented, is that Backwell will no longer be a village but a Transport Hub (as suggested in the Plan), serving the Motorway (M5 at J19/20) and surrounding areas, with more traffic, more pollution and 700 more houses, to say nothing of the over 2500 proposed for Nailsea, all vying for position on the already congested A370. North Somerset Council seem happy to propose "Tinkering" with the Green Belt in Villages like Backwell, but yet refuse to consider ALL options within their control. They are prepared to see a Link Road next to Backwell Lake, linking traffic (including Metro Bus) to Clevedon and the Motorway. Another Link Road (including Metro Bus) crossing unstable moorland, greenbelt and agricultural land on to one of the most ancient parts of Backwell at Backwell Common. Both of these would be highly detrimental to the biodiversity and visual amenity of the area. A road crossing over or under the railway line and emerging next to Flax Bourton & Backwell Cricket Club, opposite Stancombe Quarry, which already has hundreds of lorries emerging every day.</p> <p>Expanding the Car Park at Nailsea & Backwell Train Station with a Multi Level Car Park, in effect turning the Train Station and our Village in to a "Park and Ride". A multi-level car park cannot be anything other than a concrete eyesore out of place in a rural environment.</p> <p>The Local Plan talks about supporting and enhancing the Village Centre and addressing traffic issues on the A370, yet there is no substance or costings for any of this, indeed building more roads and more houses, will only add to the problem, and how does any of this enhance the centre of Backwell village? North Somerset Council seem to think that the village of Backwell and the town of Nailsea have sufficient employment and services, such as Doctors and Dentist etc to support thousands of extra people, yet the reality we know will be that the vast majority will commute in to Bristol, (particularly if the linked transport document which suggests closing Station Road under the Railway bridge is implemented!), and what of local services?</p> <p>The proposals will also be detrimental to wildlife. Mitigation is proposed for the bats, but is it even known what form this should best take? Bats are insectivores and one of their food sources are dung beetles which can only exist if there are cattle. The effect of a major highway on Backwell Lake will be significant particularly for overwintering ducks which stop over on the lake for a short period.</p> <p>Backwell is a village, it has a Village Neighbourhood Plan, which has looked carefully at sustainable growth, which is in proportion to the village, 100 new houses all given planning, all planned, all costed, all sustainable, all proportionate to the size of Backwell. That, North Somerset Council is a PLAN! Your Local Plan or "Issues and Options" document does indeed have a number of "Issues", which I object to in the strongest possible terms.</p> <p>Summary</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>It is outrageous and premature that NSC should be spending time & money considering this Local Plan in advance of the JSP even being looked at and inspected next year. The proposals to increase the size of Backwell by almost double in one foul swoop and create a "Transport Hub" with Multi Level Car Park, link roads to the M5 & a Metro Bus "Park & Ride" are unsustainable and reckless. These proposals would decimate Backwell as a village and destroy our community & wildlife.</p>	
Clare dlt		<p>I am against this plan. It completely disregards the village plan that I voted for.</p> <p>I am against the amount of development recommended.</p> <p>Against making Backwell a transport hub.</p> <p>Against putting a major road through open countryside.</p> <p>Pollution, traffic jams, wildlife destroyed, strain on our services. These are all a reality.</p> <p>It is a very ill thought out plan and gives no consideration to our village.</p> <p>I strongly object.</p>	
Cleeve Parish Council	Cleeve Parish Council	<p>This development is too large and will overwhelm the village of Backwell. The green infrastructure plan is not available and we can't tell if it will bring any environmental benefits. This development should go on the north of Backwell to avoid increased traffic through Backwell itself. This would allow a rural strategic gap to be formed between Backwell and Congresbury.</p>	
Cribb		<p>The proposed development of 700 houses is completely out of proportion to the size of Backwell and the services it can provide. The JSP is completely unsustainable and has many flaws. Many roads within the village (Station Road, Rodney Road, Moor Lane, Dark Lane, Westfield Road to name a few) are already very congested and face major issues with parked cars. They are a danger to pedestrians and school children. There is also very limited parking for the shops and services in the village. The A370 is also extremely busy and already severely congested during commuting hours. A much more sensible and sustainable option is to develop the Ashton Vale site.</p>	
D Estcourt		<p>I do not object to phasing the road development for this area (should it be required) but the proposal as indicated on the "Plan A Clevedon to Bristol Transport schemes" I do not think has been thought through for very long. The proposed link/bypass for the Backwell cross roads (E3) how is it to work? Is there to be more traffic lights/roundabout on Farleigh Road and an overpass/underpass for the railway line? The railway line crossing whether an overpass/underpass will be very expensive and this road will have to feed the proposed development of Nailsea including the Metro Bus in addition to existing traffic.</p> <p>In addition to the Nailsea developments, Metrobus and existing Nailsea traffic all this traffic will have to join with the Weston, Congresbury new Backwell development and existing Backwell traffic at this new junction (minus any traffic from Nailsea going towards Weston) to progress through Flax Bourton on the A370? The planners will have to visit this location on the Backwell Farleigh road now on any rush hour and try to cross the road. There is many a day when the evening rush hour traffic is queued up to the George Pub from Backwell cross road. The new road will not relieve the congestion at Backwell cross roads it will only encourage more traffic from the Nailsea new developments to come through Backwell rather than use the Wraxall road route into Bristol. Thus it will relocate the now congested Backwell crossroads to the New Farleigh road junction with increased traffic.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>In all honesty someone will have to put their money where it's needed and build a new road from the end of the Long Ashton bypass cross over the railway line while it's still in the railway cut out thus reducing the construction costs for the bridge and then follow the railway line to join the Backwell Nailsea road at the railway station as proposed. Should this not happen and the road is installed as the Local plan calls for the county council will have to then apply to the government for a Flax Bourton bypass to the A370.</p> <p>I do not agree that the only extra facilities that would be required in Backwell should this proposal go ahead would be a new primary school we would also need and extension to the doctors surgery which is not available in it's present position and further extensions to the comp school which would be ok provided that you do not restrict it's expansion by building this excuse of a road (E3) to alleviate the congestion at Backwell crossroads.</p> <p>The new development for Backwell the road (EE) is it intended to cater for the Nailsea to Weston traffic having passed under the Railway bridge on through the new estate in addition to the estate traffic and if so what are the intentions to cater for the cyclists will they be expected to mix with the traffic and how about the pedestrians & children of the new estate will they be catered for crossing this new estate road which will be bypassing the Backwell crossroads? Likewise for traffic in the opposite direction will they be expected to use this road as a bypass to the Backwell crossroads?</p> <p>In conclusion why build at all in Backwell or Nailsea when you could build in the Vale at Long Ashton do away with all the road patches (MM, E3, E6, W4 & W5) which would ensure that there is less impact on the environment from traffic for people to get to work in Bristol. Long Ashton is on the doorstep of the Metro bus, Ashton Vale has a wonderful road system on it's doorstep, move the green belt to Backwell and save the wonderful Backwell common from a scar of a road and save a much nicer piece of the countryside. Tyntesfield which overlooks Backwell common is a wonderful area NOT to be scarred by more roads with traffic noise and fumes. Are Great Western able to take any extra passengers commuting into Bristol from Nailsea and Backwell rail station and do you realise that the extended car park at Nailsea & Backwell Station is again at full capacity and do we need a Metro bus terminal spoiling the landscape? Let the end of the Long Ashton bypass be a transformation from a city to the wonderful countryside.</p> <p>Do people really want to move to Backwell and Nailsea when they could live closer to the centre of Bristol and their place of work having less commuting costs?</p>	
D Harris		<p>I am a local resident in Backwell (along with my wife and 3 children) and have recently reviewed the relevant parts of the North Somerset Local Plan 2036 document. Please take into account the following comments that I have to make :-</p> <ol style="list-style-type: none"> 1. The Joint Spatial Plan (JSP) is still in a consultation phase. It is far too premature for NSC to propose how the draft JSP could be implemented in North Somerset. 2. The JSP/LP proposals for a Strategic Development Location of 700 houses at Grove Farm (an increase of approx 40% in the size of Backwell) would completely change the character of the village and result in a messy suburban sprawl with no proper identity. 3. The proposal for a new school near Grove Farm is not supported by any evidence from a coherent strategic plan for Backwell's schools in the enlarged village. 4. The JSP & LP propose a new road across Backwell Common (Green Belt), creation of a 'Transport Hub' at the train station and 'improvements' at Backwell cross roads(!). The proposals for a large scale development at Grove Farm and a much larger one at Nailsea and elsewhere, will significantly increase the volumes of traffic through Backwell despite new roads being planned. The pressure on Backwell's current roads will increase with the extra households. 5. There is a total lack of clarity on how these expensive infrastructure changes would be funded, especially as they would be needed before the housing development. 6. So far there has been no proper consideration of The Vale (near the South Bristol Link Road) as a suitable location for a large scale development. This site is much closer to far more employment and would thus minimise commuting traffic. A comprehensive Green Belt Review is required. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
D Marshall		<p>Like all my fellow residents in Backwell, I am horrified by the proposed development of 700 houses at Grove Farm. This would increase the size of our village by approx. 40% in a very short space of time. This would increase the traffic congestion (already dire during rush hour) pollution and noise not only through our village but Flax Bourton as well. It will also add to congestion for people who live further towards WSM who commute to Bristol. I know a new road is planned across Backwell Common but this is GREEN BELT.</p> <p>As NSC has admitted that most employment opportunities are in Bristol, this development should be built on the edge of city at The Vale, where roads are already in place. This is Green Belt as well but this would avoid an additional 1,400 ++ car journeys twice a day through the 2 villages. This is much better for the environment and reduce travel time for the new residents of the 700 houses – work/life balance?? Why should Backwell lose its green belt for a development that will ruin the village?</p> <p>The schools in Backwell already have waiting lists and the GP surgery won't be able to cope with the additional demand when there is a national shortage of GP's which is going to get worse.</p> <p>How will a transport hub at the station and improved cross roads work? Station Road is too narrow and busy to take additional traffic and the Station car park is always full.</p> <p>This is a very ill-considered proposal drawn up by people who don't live here.</p>	
D Marshall		<p>Here are my comments in addition to those already submitted, made in reply to further info from North Somerset Council.</p> <p>In response to closing Station Rd in Backwell.</p> <ul style="list-style-type: none"> • As you should of course be aware, Station Rd was closed in the summer for implementing traffic calming measures. It was chaos as people were forced to take alternative routes to Nailsea along very narrow country lanes where lorries struggled to pass cars. • How are Backwell residents supposed to get to Nailsea and Backwell station if our access road is closed ???? <p>You cannot call the development a “village extension” as it will increase the village by 40%. How about being realistic and call it a “village suffocation” instead.</p> <p>It is obvious that the people employed to draw up these plans are totally unfamiliar with our village. What might look good on paper is clearly unworkable in practice.</p>	
D Yeates	Savills	<p>The majority of our comments in relation to questions 19 and 20 are set out under question 3 earlier in these representations.</p> <p>However, in direct response to question 19, and the proposed vision for Backwell, we consider there should be a greater focus on how future growth will be accommodated in this key location. The most significant issue which appears to be missing from the list on page 50, is the need for a Green Belt review and settlement boundary review to accommodate future development.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Furthermore, the review of the Green Belt and settlement boundary should coincide with a consideration of land to the east of Backwell, and including Farleigh / Flax Bourton. The land to the east and north east of Backwell, and surrounding Flax Bourton, is in our view entirely appropriate and sustainable to accommodate a proportion of future growth. The land is physically connected to, and integrates with the existing built form, and besides falling within the Green Belt, would not result in an unnecessary extension of the villages into the open countryside. Indeed, the land adjacent to the A370 would represent a logical infilling of existing built development at Farleigh to the east and Backwell to the west.</p> <p>Therefore, whilst we support the vision and principles set out in the Consultation Document, we consider that there should be a strong focus on both a Green Belt review and settlement boundary review at Backwell, particularly to the east, in order to accommodate future housing need and in order to ensure that the planned wider transport infrastructure can be delivered.</p>	
D Young		<p>I find it very disturbing to see that NSC are carrying on as if nothing at all had been said in objection to the JSP by a very large proportion of residents in Backwell and as far as I can ascertain, by the populations of other afflicted areas around us as well.</p> <p>There is need for new housing being built throughout the country. However, the amount of infrastructure required for a new transport hub on top of the 700 houses in Backwell and a further 2500 in West End, Nailsea, will simply eradicate the nature of Backwell Village as a village and any sense of not being within the city of Bristol.</p> <p>Any future development should be done in partnership with the local parish council, it must be small, sustainable, sympathetic and affordable for backwell residents. You must stay clear of the big housing company's who regularly build poor quality housing developments with no infrastructure with one purpose of making as much money as possible. Any development must compliment backwell and not ruin it as one of these developments would.</p>	
Dave Melton		<p>I am writing to strongly object to the North Somerset Local Plan, Joint Spatial Plan and the proposed 700 houses on Grove Farm in Backwell and the 4 Lane Link Road/Metro Bus route proposed to support this housing.</p> <p>The proposed 700 houses would result in a 40% increase in the population of Backwell, which, together with other applications, could rise to 50%. Backwell is a small village and does not have the infrastructure, facilities or employment to support this increase, therefore the proposal is not sound. This increase would also completely change the character of Backwell as a village, notwithstanding the additional traffic feeding through to an already congested A370 and the impact on wildlife.</p> <p>The plan is not justified as it has not been tested against all reasonable alternatives. NSC is the only Council in the West of England which has not committed to a Greenbelt Review, but appear to be happy to support a Link Road through untouched greenbelt in Backwell. The Plan is not consistent with national planning policy as it fails to recognise the need to review the Green Belt to provide long term growth in a sustainable manner.</p> <p>It is not effective because it is not deliverable by 2036. The 4 lane link road and metro bus route has not been costed and no funding has been identified. There is no assessment of how the road/metro bus route would be built across unstable moor land, prone to flooding. Also, my understanding is that the road would still link onto the A370 which is already congested so it would only increase traffic problems not solve them. The build rate for the 700 houses is also achievable based on NSC previous build rates.</p> <p>It is not positively prepared to meet the housing needs of North Somerset in a sustainable manner and would have a devastating impact on protected landscapes, habitats and our community.</p> <p>Backwell Lake is a beautiful spot in our village. We saw our first ever kingfisher there and have also seen otters, it seems unlikely such wildlife would continue to visit the lake if the proposals went ahead.</p> <p>We love living in Backwell and bought our home here as we wanted to bring our children up in a friendly village near to countryside. These proposals would change Backwell irretrievably and not for the better. It is not nor should it be made into a 'transport hub', it is a village and importantly a community. I find it laughable that in the</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>document it says "the development would need to be sensitively designed to integrate with the village and be appropriate for its rural setting"! How does building 700 new houses (pretty much doubling the size of the village) on fields meet this aim?</p> <p>Backwell should not be ruined for the sake of targets and other motivations that are not in the best interests of the communities involved or those looking to move into those communities.</p>	
David Cale	Mr.	<p>I wish to make the following comments where I live:</p> <ol style="list-style-type: none"> 1. The Joint Spatial Plan (JSP) is still in a consultation phase. It is far too premature for North Somerset Council (NSC) to propose how the draft JSP could be implemented in North Somerset. 2. The JSP/Local Plan (LP) proposals for a Strategic Development Location of 700 houses at Grove Farm (an increase of approx 40% in the size of Backwell) would completely change the character of the village and result in a messy suburban sprawl with no proper identity - not the description of my village in the current document. 3. The proposal for a new school near Grove Farm is not supported by any evidence from a coherent strategic plan for Backwell's schools in the enlarged village. 4. The JSP & LP propose a new road across Backwell Common (Green Belt), creation of a "Transport Hub" at the railway station and "improvements" at Backwell cross roads. The proposals for a large scale development at Grove Farm and a much larger one at Nailsea and elsewhere will, in fact, significantly increase the volumes of traffic through Backwell despite new roads being planned. The pressure on Backwell's current roads will increase - not ease - with the extra households. 5. There is a total lack of clarity on how these expensive infrastructure changes would be funded especially as they are essential before the housing development commences. <p>Furthermore, so far, there has been no proper consideration of The Vale (near the South Bristol Link Road) as a suitable location for a large scale development. While NSC seems to consider this area sacrosanct, this site is in reality much closer to the source of most of the local employment and would thus minimise the destruction of Backwell and reduce commuting traffic using the A370. A comprehensive Green Belt Review is required.</p>	
David Cale	Mr.	<p>I wish to make the following comments about Backwell where I live:</p> <ol style="list-style-type: none"> 1. The Joint Spatial Plan (JSP) is still in a consultation phase. It is far too premature for North Somerset Council (NSC) to propose how the draft JSP could be implemented in North Somerset. 2. The JSP/Local Plan (LP) proposals for a Strategic Development Location of 700 houses at Grove Farm (an increase of approx 40% in the size of Backwell) would completely change the character of the village and result in a messy suburban sprawl with no proper identity - not the description of my village in the current document. 3. The proposal for a new school near Grove Farm is not supported by any evidence from a coherent strategic plan for Backwell's schools in the enlarged village. 4. The JSP & LP propose a new road across Backwell Common (Green Belt), creation of a "Transport Hub" at the railway station and "improvements" at Backwell cross roads. The proposals for a large scale development at Grove Farm and a much larger one at Nailsea and elsewhere will, in fact, significantly increase the volumes of traffic through Backwell despite new roads being planned. The pressure on Backwell's current roads will increase - not ease - with the extra households. 5. There is a total lack of clarity on how these expensive infrastructure changes would be funded especially as they are essential before the housing development commences. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Furthermore, so far, there has been no proper consideration of The Vale (near the South Bristol Link Road) as a suitable location for a large scale development. While NSC seems to consider this area sacrosanct, this site is in reality much closer to the source of most of the local employment and would thus minimise the destruction of Backwell and reduce commuting traffic using the A370. A comprehensive Green Belt Review is required.</p>	
David Tighe		<p>I entirely agree with the following points made by the Backwell Residents Association</p> <ol style="list-style-type: none"> 1. The Joint Spatial Plan (JSP) is still in a consultation phase. It is far too premature for NSC to propose how the draft JSP could be implemented in North Somerset. 2. The JSP/LP proposals for a Strategic Development Location of 700 houses at Grove Farm (an increase of approx 40% in the size of Backwell) would completely change the character of the village and result in a messy suburban sprawl with no proper identity. 3. The proposal for a new school near Grove Farm is not supported by any evidence from a coherent strategic plan for Backwell's schools in the enlarged village. 4. The JSP & LP propose a new road across Backwell Common (Green Belt), creation of a 'Transport Hub' at the train station and 'improvements' at Backwell cross roads(!). The proposals for a large scale development at Grove Farm and a much larger one at Nailsea and elsewhere, will significantly increase the volumes of traffic through Backwell despite new roads being planned. The pressure on Backwell's current roads will increase with the extra households. 5. There is a total lack of clarity on how these expensive infrastructure changes would be funded, especially as they would be needed before the housing development. 6. So far there has been no proper consideration of The Vale (near the South Bristol Link Road) as a suitable location for a large scale development. This site is much closer to far more employment and would thus minimise commuting traffic. A comprehensive Green Belt Review is required. <p>To which I would add that the people of Backwell have produced a vision for the future of Backwell - it's called the Neighbourhood Plan. This is our semi-rural village & your proposals would turn it & Nailsea into a continuous an urban sprawl. Please listen to the views of the people who live here.</p>	
Diane		<p>Please add another sentence: " New infrastructure will be located and designed so as to avoid detrimental impact on the environment, setting and surroundings of Backwell and neighbouring settlements."</p>	
E Cook		<ul style="list-style-type: none"> • Backwell currently has planning approved for around 100 houses. These added to the 700 proposed in this development will increase the population of the village by around 40%. The proposal disproportionately affects the character of our village and will put strain on roads, rail, parking, doctors, schools and other public services. There are very limited prospects for adding retail and other premises required for an expanded population meaning that there will be more pressure on the already congested local roads. A new primary school has been mentioned amongst the proposals but adequate planning and funding to allow local secondary schools to give increased capacity must also be planned and funded. • The proposed 'strategic transport link' (AKA : a new road) is problematic for a number or reasons: <ul style="list-style-type: none"> ◦ It would scythe through habits which are important for protected and endangered species (see extracts listed below). Even after potential mitigation the impact is unacceptable. ◦ The proposal does not appear to have been costed or funds secured. On top of this the significant engineering challenges of constructing a roadway across saturated moorland have not be adequately considered. ◦ The plans do not address the other bottle necks which already exist along the A370 and these will simply be made worse. • No development should be considered until adequate transport infrastructure, including improvements to the train station, has been properly planned, funded and implementation <u>completed</u>. • Backwell would not be able to provide jobs for most new residents, who would therefore have to commute to work, increasing rush hour pressure for road and rail. Regardless of whether improvements to transport are achieved people's addiction cars will impact upon local roads and commuter routes increasing pollution. 	

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		<ul style="list-style-type: none"> • Several of the local village roads are already dangerous because they are unsuitable for the volumes and size of the traffic using them. Many of these routes are constrained by surrounding housing and are not suitable for improvement and yet will inevitably will get busier and more dangerous as increased numbers of people drive around the village. • Surrounding rural areas, such as Chelvey and Brockley, will be significantly affected by the increase in traffic going from the West End sites to the A370 <p>Climate change will extend the flood risk area into the proposed sites within the life of potential developments.</p> <p>The impact upon the local ecology, particularly with regards to protected species is unacceptable. I have collated extracts from relevant sources below:</p> <p>Kenn Hedge, Trendlewood Park Nature Conservation Management Plan 2017- 2021</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>A recent ecology survey shows that there are numerous protected and endangered animal species living in very close proximity to the proposed new access routes through Backwell common. Many of these species will inhabit the fields and hedgerows of Backwell! Common too their nesting and foraging habitats would be destroyed by the proposed 'strategic link'.</p> </div> <p>Ref: http://www.n-somerset.gov.uk/wp-content/uploads/2016/04/Kenn-Hedgerow-Trendlewood-Park-management-plan-2017-21.pdf</p> <p>Extracts from this document:</p> <p>“Findings – Fauna There are records for common pipistrelle Pipistrellus pipistrellus , soprano pipistrelle Pipistrellus pygmaeus , serotine Eptesicus serotinus , noctule Nyctalus noctula , Daubenton’s Myotis daubentonii and brown long - eared Plecotus auritus bats within 1km.”</p> <p>“There are two Site of Special Scientific Interest (SSSI) component units of the North Somerset and Mendip Bats Special Area of Conservation (SAC) within 10km; Brockley Hall Stables SSSI 3.3km south - west and King’s Wood and Urchin Wood SSSI 5.6km south - west. Both are designated due to the presence of breeding sites for greater horseshoe Rhinolophus ferrumequinum bats. The woodland is also designated due to hibernating populations of lesser Rhinolophus hipposideros and greater horseshoe bats. There is also a large known maternity colony of lesser horseshoe bats at Tyntesfield 2.5km north - east.”</p> <p>“There are records of numerous birds of conservation concern (RSPB, 2015) within 1km of the hedge. Several species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) have been recorded including kingfisher Alcedo atthis and barn owl Tyto alba . Red and amber list birds of conservation concern which use dense vegetation such as hedges have been recorded in the area including house sparrow Passer domesticus , song thrush Turdus philomelos, bullfinch Pyrrhula pyrrhula and green woodpecker Picus viridis . Ground nesting species such as yellowhammer Emberiza citrinella also rely on dense hedgerow bases for nesting and for foraging.”</p> <p>“There are recent records for otter Lutra lutra within 1km. The adjacent stream is suitable for use by otter as habitat corridor through the landscape, although is unlikely to provide a regular source of food. Otters are known to use Backwell Lake and so the stream may be an important corridor between the Lake and other rivers/streams on the Levels and Moors.”</p> <p>“There are numerous records for hedgehog Erinaceus europaeus within 1km.</p> <p>Dense habitat and scrub around the base of the Hedge provides ideal habitat for this species.”</p> <p>“Kenn Hedge clearly meets UK BAP (Biodiversity Action Plan) Hedgerow priority habitat criteria and is also an Important and species-rich hedgerow as defined by the Hedgerow Regulations 1997. Field boundaries are also local priority habitats as listed in Action for Nature.”</p>	

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		<p>North Somerset Times</p> <p>http://www.northsomersettimes.co.uk/rare-bat-found-at-backwell-lake-1-4753440</p> <p>The Nathusius' pipistrelle was seen in North Somerset, to the amazement of conservationists. The protected species has been sighted only 1,200 times since being first spotted on the Shetland Islands in 1940. The rare bat was spotted during a survey undertaken by Wiltshire, Avon and Gloucestershire Bat Group.</p> <p>Bat experts worked alongside Wessex Water to lure the rare bat so it could be ringed and identified. Ellie Philips, conservation, access and recreation officer at Wessex Water, said the bat species was a welcomed addition to wildlife at the nature reserve.</p> <p>She added: "The bat survey has taught us more about the Nathusius' pipistrelle and its feeding habits at our site. It means we'll be able to ensure we look after the site in a way that will help protect this rare species."</p> <p>Bristol Water.</p> <p>Evidently Bristol Water would have needed to carry out an ecology survey to assess and mitigate against environmental damage caused by their current works in the local area. It is evident that they have identified protected species and hopefully they are taking adequate steps to protect them.</p> <p>It does not take a leap of imagination to expect that these same species as well as others will also be resident in the areas of proposed development.</p> <p>The works which Bristol Water are carrying out are temporary and they have promised to return the disturbed areas to a better condition than when the work commenced.</p> <p>https://www.bristolwater.co.uk/help-support/work-in-your-area/southern-resilience-scheme/backwell-to-farleigh/</p> <p>The design also takes into consideration the rich biodiversity of the area, including Dormice, Great Crested Newts, various species of Bat as well as a range of plant life.</p> <ol style="list-style-type: none"> 1. <u>It is not justified because the strategy has not been tested against all reasonable alternatives</u> <ul style="list-style-type: none"> • One possible alternative is the 'The Vale' which, by its proximity to the Bristol and the new link road allows people to commute by foot, bicycle public transport or car to the main employment hub. This would be far more sustainable. With this site there would also require far less investment in infrastructure required from central government and therefore is more viable. North Somerset saw fit to allow the link road to be built through greenbelt land and yet are unreasonably determined not to at least consider sensible redrawing of some greenbelt boundaries. 1. <u>It is not effective because it is not deliverable by 2036.</u> <ul style="list-style-type: none"> • The road infrastructure required to serve Backwell and Nailsea has not been costed, has no certainty of Government funding, is technically complex to deliver (building over unstable moor land) and would result in significant adverse impacts on the rural and built environment, including the loss or the potential for harm to listed buildings, including Tyntesfield Estate. The Plan relies upon the construction of 900 homes per year across the latter years of the plan period to meet housing needs by 2036. Such build rates far exceed those achieved within North Somerset since the 2008 recession and are therefore unrealistic. 1. <u>It is not consistent with national planning policy.</u> 	

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		<ul style="list-style-type: none"> • It fails to recognise the need to review the Green Belt to provide long-term capacity for growth in a sustainable manner (see comments above). Accordingly, it does not represent sustainable development which is the fundamental objective of national planning policy. • Much of the land has very good agricultural value, which contravenes the Core Strategy aim of encouraging farming. <ul style="list-style-type: none"> ◦ In North Somerset’s Core Strategy document from Jan this year they make the following statement: “<i>Vision 6 Service Villages Vision.</i> <p><i>By 2026 the Service Villages will become thriving rural communities and a focal point for local housing needs, services and community facilities. They will become more self-contained in terms of providing jobs and serving the local and surrounding community for all their day-to-day needs, whilst protecting their individual character.”</i> Clearly a development of the proposed scale flies in the face of this statement regarding protecting the individual character of Backwell.</p> <ol style="list-style-type: none"> 1. <u>It is not justified because the strategy has not been tested against all reasonable alternatives</u> <ul style="list-style-type: none"> • One possible alternative is the ‘The Vale’ which, by its proximity to the Bristol and the new link road allows people to commute by foot, bicycle public transport or car to the main employment hub. This would be far more sustainable. With this site there would also require far less investment in infrastructure required from central government and therefore is more viable. North Somerset saw fit to allow the link road to be built through greenbelt land and yet are unreasonably determined not to at least consider sensible redrawing of some greenbelt boundaries. <ol style="list-style-type: none"> 1. <u>It is not effective because it is not deliverable by 2036.</u> <ul style="list-style-type: none"> • The road infrastructure required to serve Backwell and Nailsea has not been costed, has no certainty of Government funding, is technically complex to deliver (building over unstable moor land) and would result in significant adverse impacts on the rural and built environment, including the loss or the potential for harm to listed buildings, including Tyntesfield Estate. The Plan relies upon the construction of 900 homes per year across the latter years of the plan period to meet housing needs by 2036. Such build rates far exceed those achieved within North Somerset since the 2008 recession and are therefore unrealistic. <ol style="list-style-type: none"> 1. <u>It is not consistent with national planning policy.</u> <ul style="list-style-type: none"> • It fails to recognise the need to review the Green Belt to provide long-term capacity for growth in a sustainable manner (see comments above). Accordingly, it does not represent sustainable development which is the fundamental objective of national planning policy. • Much of the land has very good agricultural value, which contravenes the Core Strategy aim of encouraging farming. • In North Somerset’s Core Strategy document from Jan this year they make the following statement: “<i>Vision 6 Service Villages Vision.</i> <p><i>By 2026 the Service Villages will become thriving rural communities and a focal point for local housing needs, services and community facilities. They will become more self-contained in terms of providing jobs and serving the local and surrounding community for all their day-to-day needs, whilst protecting their individual character.”</i> Clearly a development of the proposed scale flies in the face of this statement regarding protecting the individual character of Backwell.</p>	
E Porter		<p>I admit that I am using comments suggested by Backwell Residents’ Association which I am a member of as a Backwell resident. I have responded previously when more capable of doing so, as you should have on record. However, apart from being somewhat overwhelmed at present (e.g. with roof repairs being delayed four times now due to recent continuous rain), I am recovering from major NeuroSpinal Surgery. But I want to be sure you are aware of my individual, very strong, opposition. I lived in Barrow Gurney for a short time in the early 90s, then for 23 years in Long Ashton, only moving to live in Backwell last September - just as all this was announced!!! So as a long-term NSC Ratepayer, Point 1 below is particularly salient.</p> <ol style="list-style-type: none"> 1. The Joint Spatial Plan (JSP) is still in a consultation phase. It is far too premature for NSC to propose how the draft JSP could be implemented in North Somerset. 	

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		<ol style="list-style-type: none"> 2. The JSP/LP proposals for a Strategic Development Location of 700 houses at Grove Farm (an increase of approx 40% in the size of Backwell) would completely change the character of the village and result in a messy suburban sprawl with no proper identity. 3. The proposal for a new school near Grove Farm is not supported by any evidence from a coherent strategic plan for Backwell's schools in the enlarged village. 4. The JSP & LP propose a new road across Backwell Common (Green Belt), creation of a 'Transport Hub' at the train station and 'improvements' at Backwell cross roads(!). The proposals for a large scale development at Grove Farm and a much larger one at Nailsea and elsewhere, will significantly increase the volumes of traffic through Backwell despite new roads being planned. The pressure on Backwell's current roads will increase with the extra households. 5. There is a total lack of clarity on how these expensive infrastructure changes would be funded, especially as they would be needed before the housing development. 6. So far there has been no proper consideration of The Vale (near the South Bristol Link Road) as a suitable location for a large scale development. This site is much closer to far more employment and would thus minimise commuting traffic. A comprehensive Green Belt Review is required. 	
Ecomotive Ltd		As above, we consider that community-led delivery and ownership should form a key component of any new development in Backwell and should therefore be included within the core principles set out for Backwell.	
Eileen Bax		I cannot object strongly enough to these ill thought out plans for Backwell, particularly in relation to transportation & associated negative impacts, let alone public services. There truly are more appropriate locations to build upon & inadequate consideration has been given to the environmental & social consequences of such a significant expansion - expansion is totally acceptable if proportionate & with all the necessary considerations having been given due diligence. This needs serious attention for the future generations of this community & its environs.	
F Parry		<p>I am deeply disappointed that local community views expressed in response to the initial publication of the JSP on 2017 have been ignored in the options presented in the Local Plan.</p> <ul style="list-style-type: none"> • Sensitive development would not be enough to integrate 700 new homes into the village of Backwell, which would expand the village beyond recognition. In fact it would become a small town with insufficient services and transportation. • Local services would be insufficient to cope with such a massive influx given that Backwell already services neighbouring villages and hamlets such as Flax Bourton and Chelvey • There is no indication of funding or timescales to support the major transport infrastructure needed for the new Backwell development. • The proposed road across Backwell Common would destroy the character of the landscape • Turning Backwell into a transportation hub with a park and ride carpark at the train station and link road across Backwell Common will destroy the village as we know it. 	
F Russell		<p>It is outrageous and premature that North Somerset Council are spending time and money considering this Local Plan in advance of the JSP even being looked at and inspected next year.</p> <p>The Local Plan is a wordy document written in council speak which means little to most people.</p> <p>North Somerset Council seem happy to propose destroy the fabric and character of the village of Backwell, but yet refuse to consider ALL options within their control.</p>	

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		<p>They are prepared to see a 'Link Road' next to Backwell Lake, linking traffic (including Metro Bus) to Clevedon and the Motorway. Another Link Road (including Metro Bus) crossing unstable moorland, greenbelt and agricultural land on to one of the most ancient parts of Backwell at Backwell Common. A road crossing over or under the railway line and emerging next to Flax Bourton & Backwell Cricket Club, opposite Stancombe Quarry, which already has hundreds of lorries emerging every day. Expanding the Car Park at Nailsea & Backwell Train Station with a Multi Level Car Park, in effect turning the Train Station and our Village in to a "Park and Ride".</p> <p>The Local Plan talks about supporting and enhancing the Village Centre and addressing traffic issues on the A370, yet there is no substance or costings for any of this, indeed building more roads and more houses, will only add to the problem, and how does any of this enhance the Centre of our Village?</p> <p>We do not want multiple doctors, dentists, leisure groups and convenience stores. The character of a village is made by having facilities where you run into your friends and neighbours. Our village character is formed by having access to the countryside, by sustainable growth and it's one public primary school and secondary school.</p> <p>The Village of Backwell does NOT has sufficient employment and services, such as Doctors and Dentist etc to support thousands of extra people.</p> <p>Backwell is a Village, it has a Village Neighbourhood plan, which has looked carefully at sustainable growth, which is in proportion to the Village, 100 new houses all given planning, all planned, all costed, all sustainable, all proportionate to the size of Backwell.</p> <p>Your Local Plan or "Issues and Options" document does indeed have a number of "Issues", which I object to in the strongest possible terms.</p> <p>I also strongly object that NSC are putting residents under unnecessary stress before the JSP. This consultation has not been well advertised and the majority of residents will not even be aware of the existence of this deadline or your destructive plans to their neighbourhood yet again. The residents over-whelmingly objected previously, with tv and media coverage and support from various expects. Many local people will not realise that you expect them to object again and again and again to the same plan as if it is the first time you have proposed it. Was your intention to disregard all previous objections? Was it to sneak this consultation out without proper advertising? Is it your strategy to go ahead regardless of the over-whelming strong local objections to your deceitful plan?</p> <p>It would seem that Backwell would be paying an extremely high price. Taking on a lot of heavy lifting in terms of traffic and building. It basically means that we won't exist anymore. It's TOTALLY disproportionate.</p> <p>Our family say "No" to I'll-conceived plan for:</p> <ul style="list-style-type: none"> • 700 Houses on Grove Farm doubling our population • Car Park Expansion at Nailsea & Backwell Train Station • Park & Ride for Trains and Metrobus • Backwell becoming a "Transport Hub" serving a much wider area • A Link Road and Metro Bus (lite) Road linking the Nailsea SW development to Backwell and eventually going on to the M5 at Clevedon • Road running next to Backwell Lake and out onto Station Road. Bringing traffic in from the Motorway and surrounding areas and destroying untouched ancient green belt land • A New access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell and cause utter chaos on the already-overloaded A370 in the village. • New access roads at Rodney Road and Moor Lane on to Grove Farm • New roads linking Nailsea. (depending on where Nailsea's 3,200 new houses are allocated). • Noise • Light pollution • Stress and extinction of some of our precious local wildlife including rare bats and bird-life, Otters, trees, hedgerows, flora and fauna. • The destruction of the soul and character of the village. • The inevitable dangerous building work that will take place for decades, with large construction vehicles driving down our narrow roads. <p>These proposals are unsustainable and reckless. They would decimate Backwell as a Village and destroy our community & wildlife.</p>	

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F Stuart-Hunt		<p>I find it deeply concerning that NSC is spending so much time, money and effort on it's local plan in advance of any firm conclusion relating to the JSP. This smacks of a council who is not prepared to listen to the views of the resident that actually live in the affected areas and wishes to press on with its half-baked plans regardless. NSC needs to stop and first listen or else run the risk of alienating itself from the very people it is supposed to represent.</p> <p>This consultation process seems so unnecessary and puts all Backwell residents under extreme and undue stress. My reasons for opposing these plans have not changed. I do not wish our village to double in size, I do not want it to become the mass transport hub that is planned, and I do not wish to have a massive new road carved out of the very countryside that drew me to this area in the first place. The knock-on effects will be enormous:</p> <p>The road, the pollution, the added road congestion (which will not be alleviated by any road), the destruction of wildlife habitats, the destruction of the peaceful village we all know and love, a new multi-storey car park, the noise. One can go on and on.</p> <p>My husband and I were drawn to living in Backwell from the city 4 years ago as we wanted to raise our family in a village with a small close community and surrounded on all sides by the countryside. The plans you have proposed seek to undo all that, and I therefore cannot remain silent on the issue, especially when NSC is failing to listen to those who are directly affected by their plans.</p> <p>As we keep on telling you there is the land next to the vale.</p> <p>Please start listening to us.</p>	
FH		<p>Changing the historic character of Backwell village into a transport hub for traffic from the M5 and A370 does not consider the wishes of the residents who would be negatively impacted by air, light and noise pollution, reduce access to green space and increase flooding in the strategic gap between Backwell and Nailsea.</p>	
First Step Homes	First Step Homes (Wessex) Ltd	<p>The Vision for Backwell is overly reliant on the success of the Strategic site, which does not allow for flexibility on delivery timescales. The Vision and development scenarios should also look at allocating non-strategic sites that are connected to the existing development and form logical extensions to the fringes of the settlement. It follows that the Settlement Boundary and Green Belt in these locations be adjusted to accommodate such sites.</p> <p>In this respect, part of SHLAA site HE18141 (see following site plan and details) is one such site that sits on the fringe of the existing built development and has the potential to deliver additional growth within the Plan period without the precursor of significant additional infrastructure requirements.</p>	
Flax Bourton Parish Council	Flax Bourton PC	<ul style="list-style-type: none"> Flax Bourton Parish Council believes the timing of the Local Plan – Issues and Options Consultation is premature given the Joint Spatial Plan (JSP) is still at a very early stage of development. It does not believe it is possible to move to the next stage until the JSP has been tested in a public forum in May 2019 and the Joint Transport Plan 4 is available for consideration in early 2019. In addition, the BRSWEL Study, the output of which is believed to be important, has not yet been made available. Also there is no study/report of railway capacity from Railtrack or train operating companies. Flax Bourton Parish Council objects to the Strategic Development Locations proposed in Nailsea and Backwell on the basis of soundness as they are unsustainable, undeliverable and in breach of national planning guidelines, particularly NPPF 11, 35, 102, 103 and 109, evidence for which is set out in our answers to questions to 19, 20 and 23. These locations have not been chosen to generate local employment opportunities. They assume the need for more outward commuting to Bristol. This has been confirmed at the Backwell and Nailsea Urban Extension Workshops to discuss the Local Plan with North Somerset's planners. Also document WED006 Updated Employment Evidence confirms. There is no assessment of the impact of further development including road infrastructure on the built environment – listed, heritage buildings etc. i.e. there are 12 listed buildings in the village of Flax Bourton, 7 on the main road (A370). No assessment is made of the economic benefit versus the infrastructure costs proposed in the JSP. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> No assessment is made of the impact of additional housing on local services – medical and dentistry facilities, schooling, post office etc. An assessment should be made and local planning should take into account the impact on nearby local villages. In the case of Flax Bourton village, Backwell is the principal service village. A full review of the greenbelt in North Somerset is requested along with a review of alternative Strategic Development Locations (SDLs) or Urban Living Locations such as The Vale, Portishead, Clevedon and Yatton. Flax Bourton Parish Council objects to the current proposed SDL's of Nailsea and Backwell given a sustainable and deliverable transport and infrastructure solution has not yet been proposed. Development to the South West of Nailsea encourages dormitory living. Development should be closer to the town centre on the North West of Nailsea. There is no assessment evidence to show that the A370 and proposed link E3 are the only deliverable option for linking Nailsea and Backwell to Bristol. 	
Flax Bourton Parish Council	Flax Bourton PC	<ul style="list-style-type: none"> Flax Bourton Council objects to the Strategic Development Locations Proposed in Nailsea and Backwell on the basis of soundness as they are unsustainable, undeliverable and in breach of national planning guidelines, particularly NPPF 11, 35, 102, 103, and 109. E3 and rephasing of Backwell traffic lights funnels all traffic from the Nailsea and Backwell SDLs currently totalling 2,900 houses in addition to the existing traffic and any additional traffic from the other SDLs through Flax Bourton which is split by the A370 which is the narrowest, slowest section of the A370 with blind bends, pedestrian pavement on only one side and then only single person width, 7 listed buildings fronting the road, concealed driveways, 5 road junctions, access to a children's nursery, primary school, working aggregates quarry and asphalt plant. The proposed E3 road link will increase traffic causing an unacceptable impact on highway safety see NPPF 109. The cumulative effect of the E3 and other proposed traffic mitigation works through Flax Bourton will be severe see NPPF 109. Moving traffic from Backwell traffic lights to Farleigh/Flax Bourton merely moves the problem at huge expense. It will not mitigate or reduce traffic. Existing traffic on the A370 is at capacity and the additional traffic from Nailsea and Backwell SDLs will exceed capacity. Not only will junction capacity be exceeded but also link capacity which will lead to flow breakdown. For the reasons stated above E3 and other traffic mitigation will have a negative impact on commuting times and economic activity. We will respond to the Transport Topic Paper 8 WED 007 and Emerging Findings Transport Report WED 008 in detail in the JSP consultation process. We do, however, comment now that these documents are flawed and do not give a plausible or credible basis to the transport proposals in this draft Local Plan. Transport Modelling is unsound, for example, it has failed to take account of the South Bristol Link Road in transferring congestion from Barrow Gurney to the A370. Also Figure 3.6 of Transport Topic Paper 8 (WED007) shows AM peak forecast traffic flow differences without mitigation and predicts surprising results, for example, A370 SW Brockley traffic lights increase of 300-600 PCU (from the SDLs of Banwell & Churchill) but traffic then disappears. Where does it go? Topic Papers show a peak hour increase of 600 vehicles through Flax Bourton. Up to date figures from a NSC assessment in November 2018 show that this represents a 60% increase in peak hour traffic which is unsustainable. Assessment evidence should be shown that the A370 and the proposed E3 link is the only deliverable option for linking Nailsea and Backwell to Bristol. We support E6 of the transport scheme as it will improve bus access to Bristol on the Long Ashton bypass which has become increasingly congested since the opening of the South Bristol Link Road. As stated in reply to Question 3 the absence of Joint Transport Plan 4, BRSWEL Study and any study or report from Railtrack or Train Operating Companies prevents any reasonable discussion for the determination of the locations of SDLs and the transport serving them and therefore whether they are sustainable. This plan is unsound. No assessment is made of the impact of additional housing on local services - medical, dentistry, schooling, post office etc. An assessment should be made and local planning should take into account the impact on nearby local villages. In the case of Flax Bourton Backwell is the principle service village. 	
GaryB		<p>I have attached a PDF document containing our views & concerns regarding the proposal for the development of Backwell.</p> <p>I have taken photos to support our concerns regarding the inadequacy of parking, local roads, shops and services in Backwell to support a dramatic increase in population. Our major concern is the impact on Backwell as a village community and its' total loss of character under these proposals.</p>	Planning Feedback Word Dec182.pdf (24.5 MB)

Respondent Name	Respondent Organisation	Comment	Attached documents
H & J Sparey		<p>I am writing against the JSP in respect of Backwell. Backwell is a lovely village with wonderful green spaces around it. I cannot understand why the Council would want to put a huge polluting road through Backwell Common (green belt), a very negative move for the countryside and the wildlife. This would produce bottle necks at Flax Bourton and Nailsea. A multi-storey car park next to the station again would be a blot on the landscape. The beautiful Backwell Lake would suffer. I feel that the people coming up with these outrageous plans don't really understand what it is like to use public transport. I use the train every day I work, not enough has been invested in the rolling stock so most of the trains are overcrowded. The trains are often delayed or cancelled. Rather than decimate the country side why isn't more money invested in the transport already in existence. The park and ride is now a joke, it's a shoppers bus! It takes twice the time to get into Bristol and you have to walk further to get to a bus stop if you work in the city. I know for a fact that people are not using the park and ride as they did previously. We have bottle necks at the end of the bypass due to the new road and the roundabout. I feel the planners haven't a clue, there never seems to be any forward planning.</p> <p>Yes we do need more housing but keep it in proportion to the villages. I feel that there is enough spaces within Bristol to build new housing. People choose to live in a village because they like the peace and quite. People choose to live in a city because they love the buzz and facilities. Let's keep our green spaces and quiet villages and stop ruining places, we will not be able to undo some of these horrendous plans if they go ahead. Why would anyone in their right mind want to make Backwell a transport hub?</p>	
H Coombs		<p>A massive road, destruction of wildlife, noise, light pollution, a multistory carpark. Really?! Come come now, is that right that people who have been living in a peaceful village now have to live in a transport hub?! To think people will sit back and give you a big thumbs up whilst you violate them is frankly laughable.</p> <p>It would seem that Backwell would be paying an extremely high price. Taking on a lot of heavy lifting in terms of traffic and building. It basically means that we won't exist anymore. It's TOTALLY disproportionate. Below is a very short list of the issues.</p> <ul style="list-style-type: none"> • 700 Houses on Grove Farm doubling our population • Car Park Expansion at Nailsea & Backwell Train Station • Park & Ride for Trains and Metrobus • Backwell becoming a "Transport Hub" serving a much wider area • A Link Road and Metro Bus (lite) Road linking the Nailsea SW development to Backwell and eventually going on to the M5 at Clevedon • Road running next to Backwell Lake and out onto Station Road. Bringing traffic in from the Motorway and surrounding areas • A New access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell. • New access roads at Rodney Road and Moor Lane on to Grove Farm • New roads linking Nailsea. (depending on where Nailsea's 3,200 new houses are allocated). • Noise • Light pollution • Stress and extinction of some of our local wildlife including bats, Kingfishers, Otters etc 	
H Parry		<p>This proposed vision is completely unsound. There seems to be little detail on how any 'improved' infrastructure would be funded - a huge road-building/engineering project etc. Effectively doubling the size of a village (700+ new houses) is a contradiction in terms - this is totally unsustainable since any supporting infrastructure would negate the fabric of a village 'feel'.</p> <p>Backwell has been identified as a 'Highly Sustainable' village following the adoption of the Neighbourhood Plan (2016-2026 and officially approved in 2015), promoting gradual development. It appears this proposal disregards this entirely. The expansion of Backwell is completely disproportionate and would result in existing and new residents having a compromised 'quality of life'. The Neighbourhood Plan supports development, but in a sustainable and manageable way.</p>	

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Heidi Rhodes		<p>The fact that NSC are spending a lot of money on this local plan before the JSP has even been considered this matter is deeply troubling. It makes it very difficult for us to trust that NSC are actually going to take any notice of, let alone address, any of the concerns we raise during this consultation - and puts residents under unnecessary stress at this stage.</p> <p>Backwell would be paying an extremely high price for this JSP, and the proposed actions and development are totally disproportionate to the nature and size of our village. My reasons for objecting to this JSP include:</p> <ul style="list-style-type: none"> • Serious impact on local wildlife, including bats, otters and kingfishers - particularly due to the extent of disruption to Backwell Lake area. • The significant increase in the village population, with no clear plan or prioritisation for an increase schooling or other essential services provision, and definitely no plan for increasing other services / facilities. • Severe impact on infrastructure: it appears that Backwell will become a 'Transport Hub', serving a much wider area, which will vastly increase non-resident passing traffic; yet traffic for all of the 700 new houses would emerge out on to the A370 at Backwell, thus having an even greater impact on traffic congestion - and access to the new development appear to be planned off roads that are just not capable of taking the volume of traffic that would be sent their way. • Increase in noise and light pollution. 	
Huw Parry		<p>This consultation is premature considering that the JSP Independent Inspection has not taken place.</p> <p>This proposal is completely unsustainable and would have a detrimental environmental impact (doubling the size of an existing village, pressure/stress on existing services, ruinous traffic on already overstretched infrastructure, increased pollution, loss of rare wildlife habitats etc.) not just for Backwell, but for all neighbouring villages. Development at the scale proposed would change the overall character of the village, making it a more urban environment. 'Quality of life' for existing and new residents does not seem to be taken in to consideration.</p> <p>Backwell has been identified as a 'Highly Sustainable' village following the adoption of the Neighbourhood Plan (2016-2026 and officially approved in 2015), promoting gradual development. Any development should be scaled back significantly so that it's sustainable.</p> <p>The areas for strategic development outlined in the proposals will result in an increase in commuting on already overstretched infrastructure. The 'knock-on' effect for key entry points to Bristol (such as Cumberland Basin) would be significant.</p> <p>North Somerset Council has not committed to a 'Greenbelt Review' which could identify some alternative, more sustainable sites for development, closer to Bristol where the majority of the region's employment is centred. This would result in significant capital savings since proposed sites closer to Bristol (such as The Vale) have significant infrastructure already on the doorstep (roads and MetroBus), along with means to support achievable sustainable transport (walking, cycling) to nearby services and employment opportunities. A greenbelt review could result in amending the boundary of the greenbelt so that a site such as 'The Vale' could be fully explored/realised.</p>	
Iain		<p>This consultation is premature and inappropriate given that the JSP Independent Inspection has not taken place. The scale of the proposed developments at Backwell are completely inappropriate given the current size of the village and existing infrastructure.</p>	
J Ashman		<p>Yet again I repeat my views. No to huge expansion due to pollution noise flooding. We paid a lot of money to move to the country and commute. We spend a lot of money renovating an old house in Backwell. Why should we have to become a large suburb of Bristol and Weston. I say think again. Keep the green areas and housing estate on a smaller level and keep our valley safe.</p>	

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J Hollis		<p>My family moved to Backwell Common last September from Bristol with our young child. My husband and I have worked hard to afford this place. We wanted a rural location, Green Belt, small road running past our house and small village. Found the perfect house the only issue was the railway running past but weighed up the pros and cons, at least the noise is not constant and no traffic fumes. We have bats, deer, owls, door mice and an excellent selection of wild small birds in and out of our garden. We have planted over 45 trees on our property. With a specific area for native British trees. We want to help the local wildlife and enjoy a quiet rural landscape with fresh air. Our property is surrounded by fields with many beautiful healthy Oaks. Then these plans appeared last October a month into us moving to the house. Had we known we would not have moved. They did not appear on internet searches or through the solicitors searches prior to purchase.</p> <p>Backwell residents have already fought and agreed for a neighbourhood plan for houses. Why is this being overlooked after being accepted? I object to these 700 houses which is disproportionate to the size of the village. People who already live here do because it is the size it is. Backwell Residents have already come up with a plan. These "affordable houses" who can afford them? Not local people.</p> <p>I object to a new motorway link road, metro bus road being built over Backwell Common destroying not only wild animals home by my home. Where is my family going to go? No not in one of those affordable houses!</p> <p>The entrance to Bristol from A370 by Long Ashton is a bottle neck already. There will be traffic jams from Clevedon junction, along Backwell lake, through the Common to Bristol.</p> <p>The destruction of the Common which is used by hundreds of people each week for recreational use will affect the well being of the users (if it can be used,)and the wildlife. The noise pollution of constant motorway traffic. As the new link road will be treated like the M32 into Bristol. Will be of detrimental effect to residents in Backwell and Nailsea. Why would people want to cycle and walk near that. You say "Backwell will remain an attractive and vibrant village set on the edge of the Green belt."The Green belt at the moment is part of Backwell!! Backwell Common is in the green belt and in Backwell!! That's what my address says!</p> <p>A new road will not ease congestion and air pollution. More road equals more room for more cars equals more congestion and more air pollution more health issues for people and any wild animals that survive.</p> <p>Object to the multi story car park by the train station. Instead of carving up the countryside for a polluting metro bus or general traffic why don't you put money into improving the train service along the West. So people would not need to drive from Weston to Bristol.</p> <p>I object to what has not been agreed to by the neighbour plan. How about redevelopment of brown sites in the city where people actually want to live and work and be vibrant there. They will not need cars, so reduced air pollution.</p> <p>The local plan needs to be more detailed of what your ideas are. There are no maps of what the ideas are of the road over Backwell Common just an ominous black arrow.</p>	
J Howard		<p>This Vision transforms village into a small town. Nailsea is a far more sustainable location and has capacity to accommodate growth to support an oversized town centre.</p>	
J Keighley		<p>I am writing to object strongly to the Local Plan and in particular the proposed 700 houses on Grove Farm in Backwell and the Link Road/Metro Bus Route between Bristol and Nailsea, proposed to support this housing.</p> <p>The proposed 700 houses would result in a 40% increase in the population of Backwell. Together with other outstanding applications this could rise to around 50%. Backwell is a small village and does not have the infrastructure, facilities or employment to support this increase. The Local Plan is therefore NOT SOUND. This increase would also completely change the character of Backwell as a village. In particular, lack of consideration has been given to the following:</p> <ul style="list-style-type: none"> • Air pollution, both during the build (the infant school, playgrounds and village playing fields are immediately adjacent and downwind of the planned developments) and from additional road traffic both during and after the build • Additional commuter traffic adding to congestion on the A370 through Backwell and Flax Bourton until the proposed Link Road is built 	<p>John Keighley - 19 Station Road Backwell BS48 3NW.pdf (70 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • After Link Road is built, the risk of encouraging a significant proportion of M5 traffic to be funnelled into the notorious bottleneck on the A370 entering Bristol, particularly at peak times • Primary and secondary school capacity • Medical centre and dentist capacity • Impact on rare wildlife including bats who forage over Grove Farm and other areas on the proposed route of the Link Road – who would be significantly affected by loss of habitat, noise and light pollution – and otters who live at Backwell lake who would be severely impacted by a large road in close proximity to their habitat • Impact on a wide range of other wildlife including migrating birds at the lake, deer, hares, badgers and foxes across Backwell Common, Grove Farm and the proposed route of the link road through the valley • Loss of some of the most beautiful landscapes and rich biodiversity in the area • The impact of the Link Road on the peace and tranquillity of Backwell Lake, which is a hugely valuable and well-used community asset for people of all ages to exercise and to educate children about wildlife and the natural world <p>Last, but certainly not least, safety on the already congested and dangerous roads through the village, in particular Station Road which is narrow and already very busy. We live on this road and see regular near-misses. With increased traffic during construction, including large, heavy vehicles, as well as the increased traffic from the significant increase in population, this situation can only get worse and would almost certainly lead to injuries in future. From a moral standpoint, this cannot be allowed to happen.</p> <p>As a result of the above points, the plan is NOT POSITIVELY PREPARED.</p> <p>The plan is NOT JUSTIFIED as it has not been tested against “all reasonable alternatives”, which include “The Vale” a piece of greenbelt land just outside of Bristol which already has the infrastructure (a new Link Road and Metrobus route) and is close to services and employment in Bristol. NSC is the only Council in the West of England which has not committed to a Greenbelt Review, yet is happy to support a Link Road through untouched greenbelt in Backwell and the surrounding valley.</p> <p>In terms of sustainability, development in the area surrounding the South Bristol Link Road (SBL) would also have the following advantages over the proposed developments at Nailsea and Backwell and beyond:</p> <ul style="list-style-type: none"> • Sustainable transport – opportunity for active sustainable transport (cycling and walking) into the city centre as well as use of existing public transport links • Not further contributing to clogging up the already congested A370 through Backwell and Flax Bourton, as well as upon entry to Bristol and into the Cumberland Basin – which is already a notorious bottleneck at peak times • Avoiding significant carbon emissions which would be generated by additional commuting into Bristol (where the majority of employment is likely to be) from the developments in Nailsea and Backwell • Avoiding additional air pollution, traffic and parking issues in Bristol from the additional commuting mentioned above • Could deliver more homes than the total planned for Nailsea and Backwell combined • I understand the area is a more helpful place to provide affordable housing due to the proximity to the city, jobs and facilities • Despite being in green belt, this potential site is within a portion of green belt which has already had the landscape, habitat and natural environment compromised with the SBL, versus untouched greenbelt in the valley out to Backwell <p>Just to clarify, I don’t support building on green belt if there are better alternatives. However, in this situation, building closer to Bristol would seem to be the better option by quite a significant margin as it is a far more sustainable location and much of its landscape and natural history interest has already been significantly impacted by the new SBL.</p> <p>The Plan is NOT CONSISTENT WITH NATIONAL PLANNING POLICY as it fails to recognise the need to review the Green Belt to provide long term growth in a sustainable manner. In addition, there is currently a large amount of land which is allocated and approved for housing that developers are failing to deliver to planned schedules in North Somerset. Should ways to increase build-out rates at these sites also be considered as alternatives to more greenfield sites? If this were possible, this would also mean that the plan is NOT JUSTIFIED as this may provide an easier and more “reasonable alternative”. I am aware of projects happening in other areas that are having huge impacts on build rates where the developer previously couldn’t see a way to improve them. I personally know people in the</p>	

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		<p>industry who have been involved in dramatically improving build rates in other areas and would be very happy to do more research into this and provide further details if this would be of assistance.</p> <p>The plan is NOT EFFECTIVE because it is not deliverable by 2036. The link road and metro bus route has not been fully costed and no specific funding has been identified. My understanding is that there is no certainty of Government funding. There is no assessment of how the road/metro bus route would be built across unstable moor land, prone to flooding. A potential solution suggested at one consultation about building it on stilts would significantly add to the cost as well as to the detrimental impact on the landscape and wildlife, together with the air, noise and light pollution in the area. The build rate for the 700 houses is also unachievable based on NSC previous build rates.</p> <p>In addition, as mentioned earlier, the proposed Link Road is likely to attract a significant amount of additional traffic from the M5, which in addition to adding to air, sound and light pollution and congestion in the local area would also significantly increase congestion where the A370 enters Bristol which is already a significant bottleneck at peak periods.</p> <p>In summary, the plan is NOT POSITIVELY PREPARED to meet the housing needs of North Somerset in a sustainable manner and would have a devastating impact on protected landscapes, habitats, the local environment and our community.</p>	
J Middleton		<p>As a resident of Backwell I am frankly horrified at the proposals for our village. Unfortunately, I was unable to attend the consultation workshop in Backwell but I have heard from people who were there. They told me that the impression was that North Somerset Council were happy to go along with the JSP and were completely abandoning Backwell to its fate! As far as I am aware the JSP is still in a consultation phase so why are North Somerset asking for comment now?</p> <p>These plans for the location of 700 houses at Grove Farm, along with the plans for over 3000 houses in Nailsea would completely destroy the character of the village and result in a messy urban sprawl with no proper identity.</p> <p>The new houses would be expensive (even so called affordable homes would not actually be affordable, as Backwell is a very expensive area) and therefore not provide any of the reasonably priced starter homes the country desperately needs.</p> <p>The building of this number of houses and the new roads would have a serious impact on important and protected open spaces and wildlife habitats including the diverse and rare species found at Backwell Lake (For example the recently discovered Nathusius' Pipistrelle (http://www.northsomersettimes.co.uk/rare-bat-found-at-backwell-lake-1-4753440)</p> <p>Building more homes would put a great deal of pressure on local schools particularly Backwell School which currently takes pupils from as far away as Cleve and Yatton. With a huge influx of new families into Backwell, children in these areas will find it hard to find school places. There does not seem to any strategic plan for addressing this issue.</p> <p>There seems to be no clarity about funding for the proposal to build a new road across Backwell Common (Green Belt) and create a transport hub at the train station. How is this going to be funded? The proposed road will have to be built over a flood plain and unstable moorland. The planning, design and building of the roads will have to take place before construction of homes and will likely take many years and be extremely expensive.</p> <p>Even with the new roads there will be significantly increased volumes of traffic through Backwell and increased pressure on the current roads that have in recent years seen a large increases in traffic numbers anyway.</p> <p>I believe other alternatives have not been properly considered. A much better site , for example, for a development of this size would be 'The Vale'. This proposed site is much closer, and already has adequate transport links, to Bristol. Building closer to Bristol would be less expensive and save taxpayers money and avoid the loss of quality agricultural land. This oversight is not consistent with the National planning Policy which recognises the need to review Green belt to allow for growth.</p>	

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J Ratcliffe		<p>We should like to voice our views on the above plan to build 700 houses at Grove Farm, Backwell.</p> <p>Our transport system to Bristol is currently diabolical. I take a small grandson to Nursery in Clifton and have to leave soon after 7.00 am in order to avoid the bulk of traffic flowing along the A370. It is still very slow and can take nearly an hour sometimes. The slip road from the A38 has made it worse.</p> <p>We live off Backwell Common, and another road coming across the common would make things even more difficult when it joined up the A370 at some point! A road would be detrimental to the environment particularly Backwell Lake.</p> <p>The existing services and facilities in Backwell are not sufficient to support this growth.</p> <p>Surely it would make much more sense to use land adjacent to the new Bristol South link road, called 'The Vale'. It would be much closer to Bristol centre, for walking and cycling, and save adding more vehicles to the daily congestion.</p>	
J Sutherland		<p>Before starting I should address the (perhaps inevitable) suggestion that my objections amount to 'NIMBYism' or is an attempt to protect the value in my own property. My house in Backwell would not be directly affected by the proposed development as it is on the other side of the A370 from Grove Farm. However, my family loves Backwell and loves living here and I feel that these proposals will have an enormous detrimental impact on the village as a whole, while not solving the problems that the Local Plan seeks to address. Therefore I remain strongly opposed to the proposals even though the direct impact on my own property is limited. Also, Backwell has sought to embrace the clear need for more houses, adopting a Neighbourhood Plan which accepts that there should be development in the village, albeit on a scale which can be absorbed without causing irreparable damage to the existing village community, services and environment. It seems slightly hypocritical for North Somerset Council and WECA to praise Backwell for being so forward thinking in adopting a Neighbourhood Plan, only to then seek to ignore that plan and the wishes of the local residents.</p> <p>My first observation would be that the Local Plan proposals in relation to Backwell are extremely premature, given that the draft JSP is currently only at examination stage and you will be aware that there was widespread and well-reasoned local opposition to both the proposal to build a further 700 dwellings at Grove Farm and the proposal to build a new A370 link across Backwell Common. Similarly, there has been widespread opposition to the proposal to build more than 3000 houses in Nailsea. The Council's decision to press on with consultation on both, highly controversial, aspects of the JSP at a time when examination of the JSP has not taken place, suggests that the Council is either paying no regard to local views on these issues or intends to present the development as a 'fait accompli' regardless of the outcome of the JSP examination. Either way, the process appears not to pay any due regard to the views and opinions of the local population.</p> <p>Process aside, I would also like to register my opposition to the proposals to build 700 houses on the edge of Backwell and in relation to the proposed link road. Both proposals appear ill thought-out, do not pay regard to the Backwell Neighbourhood Plan and, critically, appear to fail to meet the requirements for Sustainable Development as set out within the consultation document. Although the criticisms raised in the JSP consultation are noted in part 4.3 of the local plan consultation paper, nothing new appears to have been proposed to deal with the very real concerns which have been raised in respect of the impact of the proposed development on village amenities, transport systems, flooding, local environment and the general cohesion of the village.</p> <p>No thought appears to have been given to the impact that approximately 1400 further adults (plus children) will have on delivery of local services. At present, there is already extreme strain on the local GP practice, no NHS dental provision and the schools are over-subscribed. Adding this number of new residents without any provision for additional healthcare appears to be short-sighted at best. While I note the proposal to build a new primary school I note the concerns raised by the Residents Association about the fragmentation of primary school provision and there do not appear to be any proposals in relation to Backwell School – also, what proposals are being made for the children who currently come to the Backwell schools from surrounding communities – if the catchment shrinks (which it inevitably will), what provision would be made for these children in the future? Aside from the specifics of healthcare and education, the addition of so many new residents is also likely to have a detrimental impact on the leisure centre (assuming the Council does not close this!), retail space, village halls etc – again there do not appear to be any proposals to expand the provision of such services. No allocation of additional housing should be made without concrete proposals to meet all of the above issues <u>before</u> any construction of new houses is contemplated.</p> <p>A further significant concern relates to transport. There is very little local employment in Nailsea and Backwell. This means that almost everyone who moves into new houses in Backwell will be commuting to Bristol or to Aztec West and the other employment centres around the city. This is going to result in a significant increase in car traffic, both</p>	

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		<p>at commuter times and more generally as well as increased demand for what is already a chronically over-used train line. I note the proposals to turn the station into a 'transport hub' but measures to improve access and car parking at the station (or even to extend the platform) are worth very little unless there is an increase in both the frequency and capacity of the trains calling at Nailsea and Backwell. There is no discussion of how this would be achieved as this will presumably require collective action with both First Great Western and Network Rail – until concrete proposals are set out in this respect, any aspirations for improved services from the station are pure conjecture.</p> <p>The situation in relation to the roads is even more troubling. I commute into Bristol by both rail and car and the A370 route into Bristol is highly congested even on quiet days. Adding another 700+ cars to the existing situation is just going to make this worse. The link road proposal appears to add little, given that the existing bottle-neck is the roundabout between the A370 and the South Bristol link road (in indeed the gridlock then stretching into Bristol) – running another road into the A370 at Flax Bourton will just add more cars to the existing gridlock – meaning we will have torn up historic farmland and wildlife habitat to achieve precisely nothing. The only realistic solution to this issue would be to build the new houses in the Vale where they already have access to the Metrobus system and other local public transport leading into Bristol (or indeed can easily cycle into the city).</p> <p>The proposal to build 700 houses and the link road will also be a disaster for local wildlife and the environment. The impact on Backwell lake with its wild bird and otter populations would be drastic. So would the loss of farmland around Grove Farm, which supports a well-established population of bats as well as other wildlife. The concreting over of this area also appears likely to have a detrimental impact on both the green aspect and the air in West Town, something which we will regret once it is gone. The building of houses and a road in this area also seems extremely short-sighted given that they are on a flood plain, something which is presumably likely to become more of a risk factor over time. I would also question whether building a new road across a flood plain is an optimal use of public money as there will presumably have to be further engineering provision made to avoid the road being damaged or closed by future flooding?</p> <p>Finally, the proposals amount to increasing the size of Backwell by nearly 50%. This will almost inevitably change the feeling and closeness of the village – in fact, could it even be called a village at all if these houses are built? Backwell's community spirit is one of the things which makes it special and something which attracted many of the current residents. Unilaterally changing this without regard to the clearly expressed views of the existing residents would be regrettable and is presumably something which an elected body would be loath to do, given that its power is only derived from the democratic will of its population?</p> <p>Taking all of the above into account I do not consider that the current proposals in the draft Local Plan meet the objectives the Council has set itself. Building this number of houses in Backwell will only lead to further infrastructure issues which the Council will have to then solve in the future, potentially at significant cost. I would suggest that a better solution for North Somerset would be to focus development around Weston and the Bristol fringe where the houses are located as close as possible to the jobs of their residents and where existing local infrastructure is more developed and accessible. This solution would be far more sustainable and would presumably come at much lower cost for the Council and for the related public bodies who would have to find solutions to the infrastructure issues.</p>	
James		<p>I am opposed to the development pertaining to Backwell. Backwell already had its sensible and sustainable village plan approved. This new plan rides rough shod over that plan without consultation and approval of residents. In fact there has already been significant resistance to the new plan which has not been addressed. The proposal of 700 new homes in particular is badly sited, encroaching upon the separation area between Backwell and Nailsea. The additional infrastructure required to support that development in terms of traffic beyond Flax Bourton into Bristol is not in the plan. The infrastructure developments that are in the plan badly affect the character of the village, spoiling a key area of natural beauty that villagers have always considered protected. The impact on traffic on the A370 main route into Bristol will be huge and dramatic, particularly given other proposed developments along that route, namely Ashton Vale. Failings of existing local metro bus projects and poor uptake of those schemes do not inspire confidence that traffic will be sustainable.</p>	
Jeanne Craske		<p>You indicate that a new primary school will be needed but that other local services will be found in the existing village centre. We remain to be convinced of this, with the medical centre already being at full stretch and there being little car parking in the village centre to service the local shops. It is all very well to say that pedestrian and cycling routes will be provided but we all know that these would only be used by a minority of the residents of the proposed new houses.</p> <p>As you indicate, transport improvements are essential ahead of any new development. A new Station Road/A370 link will not, however, solve the problem of congestion in the centre of Backwell, nor the beginning and end of the day congestion on the Long Ashton by-pass, already made worse by the 'new'</p>	

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		<p>roundabout at the bottom of the by-pass. Once more, I would urge you to reconsider the Vale as a more suitable area for development, being situated, as it is, close to the main employment centre of Bristol. Already people cannot rely on being able to arrive at work on time and this will only get worse with more massive developments in North Somerset. Whilst we all appreciate the existence of Green Belts, they should not be regarded as sacrosanct. Circumstances change and policies need to be revisited. A review of the Green Belt policy in North Somerset is long overdue.</p> <p>There is no indication of how any improvements to the transport infrastructure would be paid for or, indeed, achieved at all. Surely, too, it is somewhat premature to try and make definitive plans for North Somerset before the overall Joint Spatial Plan has been put in place. It is especially important to look at the overall picture when Backwell is so close to Nailsea where an even larger number of new homes are proposed.</p>	
JemB		<p>Development in Backwell should be avoided if possible or at least delayed to allow focus of development in Nailsea and limited construction resources focused on one area. Certainly no development should occur until the proposed new A370 is built. Concerns over lack of facilities, needs to bring more children villages such as Winford as Chew Valley is full and demand there rising.</p>	
Jenkinson		<p>I strongly object to North Somerset Council spending time and money considering this Local Plan in advance of the JSP even being looked at and inspected next year. The proposals to increase the size of Backwell to this extent is ludicrous and completely unsustainable. NSC seems hellbent from these proposals of depriving residents and our children of green spaces and wildlife by turning Backwell into a transport hub. The amount of houses proposed will create a massive traffic problem. Where do you propose all these people will work because Backwell certainly does not have any employment opportunities or the infrastructure to accommodate 700 more houses. I furthermore strongly oppose any plan to put a road alongside the lake and find it unbelievable that North Somerset Council are happy to destroy the habitats of the wildlife that currently thrives there. The greenbelt land that NSC propose to build on from what I can gather is unstable moorland so why is this a realistic option when there are other sites much more suitable that have already been compromised by having a link road put through it! Backwell is a Village, it has a Village Neighbourhood plan, which has looked carefully at sustainable growth, which is in proportion to the Village, 100 new houses all given planning, all planned, all costed, all sustainable, all proportionate to the size of Backwell. I object to North Somerset Councils Local Plan in the strongest possible terms.</p>	
Jenny Holmes		<p>As a Backwell resident for the last 6 years, I have enjoyed living in this village and the strong community atmosphere here. I do object to the plans to build 700 houses on the edge of Backwell, knowing that it would almost double the size of the village and therefore turn it more into a small town.</p> <p>The infrastructure of schools and doctors currently works well in Backwell and there is a cohesive feel as there is only one school in the village. While building a new school is certainly necessary for the new houses, it would dramatically change the character of the village and of young families as they would be split between 2 schools.</p> <p>The proposals for the transport hub do feel very over the top for a village. Again I can see the need for such big transport projects if 700 houses are built in Backwell and another 1700 in Nailsea, but it would dwarf the village having such a major road around it. It would be essential and I fear that the money for a large transport project like this would not be forthcoming and instead the houses would be built and then the traffic would be driven onto the existing roads, which would cause serious tailbacks and congestion through the village which is already busy at peak hours.</p> <p>I have reviewed the Taylor Wimpy plans for 3 garden villages at Ashton Vale and feel these would not cause disruption to any existing village, would have transport link directly on their doorstep and would be much better for environmental travel such as biking and walking to local job opportunities in Bristol. I would seriously ask North Somerset to review these plans further.</p>	

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Joanna O'Halloran		<p>I am writing to voice my concerns over the proposals for Backwell in the North Somerset Local Plan.</p> <p>Of particular concern is the following statement: <i>"A development of this scale would require a new primary school, but most other local services and facilities would be found in the existing village centre."</i></p> <p>There is no way that the current services can support a community the size that is being proposed. This would have a huge detrimental impact on the current residents, but also on any new residents.</p> <p>Additionally the premise that this volume of housing can be contemplated with the current transport that is in place is ridiculous. The plans in place for improvements to the transport to support the plans have some significant flaws:</p> <ol style="list-style-type: none"> 1. The investment that would be required is not guaranteed and there is a risk that the housing development would be approved without the necessary infrastructure 2. Even in the unlikely event that the funding is in place and plans can go ahead for the roads and the transport hub, the new roads still join up with the A370 which is already at maximum capacity (as anyone who has travelled on a Friday afternoon can testify there are usually 1 mile tailbacks to the crossroads) <p>While I totally agree that new housing and also improved transport links is needed, the current plans are flawed and will create more problems not only for the current community but also for new residents. I would suggest that investment needs to be made to the railway station and existing roads BEFORE any housing development can even be considered.</p>	
JS		<p>After trying to access the planning comments on your web site I find that it has closed early. This as well as very wordy document you published make me feel that you are not open to comments from concerned residents of affected areas.</p> <p>I feel that your consultation is premature due to the JSP being looked at. The proposal is outrageous without any consultation of local people. Whereas I understand the need for housing surely you look at the whole not just empty land.</p> <p>Backwell and Nailsea has little if any employment nor prospects for it so where is the employment prospects you talk about. The infrastructure does not exist to sustain doubling the size of the village. As far as building a junior school what about when those children grow and need a senior school where will they go.</p> <p>I have not seen any environmental risk assessments either. Could you point me in the direction of these please. Any building around the lake in Backwell and the common will be catastrophic for wildlife, flora and fauna. What will be done to protect it? The thought of building a road and metro link through it is outrageous. The pollution from cars and lights will be horrendous and effect all residents.</p> <p>The ring fencing of the green belt area in the vale is short sighted when green belt has been changed in the Whitchurch area for the building of houses there. Why is this?</p> <p>For these reasons and many more I wish to object to the councils proposal for the hub and houses proposed.</p>	
K Clement		<p>Building 700 new homes in Backwell with the proposed new road would adversely affect the local landscape and overwhelm the existing amenities.</p> <p>The lack of local employment opportunities mean that all the residents (at 2 cars per house) would need to commute to Bristol. As someone who currently commutes, I find that the newly- built link road has caused major issues getting from the A370 into Bristol and to the Park and Ride. The proposed new road will join the A370 at Flax Bourton, thereby causing even more traffic queues along the A370 into Bristol.</p> <p>Just getting from the proposed new build onto the A370 will be extremely difficult.</p>	

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		<p>It would seem to make sense to build houses closer to the city, such as The Vale which is already has the new Metrobus. It is important to build new affordable housing for our young people. Backwell is becoming more and more a place of large, executive houses, with even retirement bungalows are being extended to twice their size and becoming unaffordable. I feel the Vale could be more suitable for affordable housing.</p> <p>I also wonder why the council is so reluctant to review it's Green belt policy in line with national planning policy.</p>	
K Payne		<p>I am writing to log my strong opposition to the proposed plan to develop/ extend Nailsea and Backwell station, and the desire to build a link road in/near the lake and over Backwell common.</p> <p>Although I appreciate the need for more housing and improved infrastructure I do not believe this should be done at the expense of our sites of natural beauty.</p> <p>The lake and Backwell common provide not only a clear division between the two villages it also provides a beautiful space for all to enjoy. A beautiful lake with many species of bird and mammal (I believe there are otters). Which is the perfect beauty spot for all from old to young. The common is a fine example of traditional English countryside which is both beautiful and unspoilt.</p> <p>Increasing the size of the station will increase traffic and pollution. I feel that Temple Mead would be better developed including brownfield sites to make a mega bus station/ transport hub. I do not believe that it is needed at Nailsea and Backwell.</p> <p>There is already congestion on station road and the A370 during peak times and these roads will not tolerate much more traffic. Although the 10min drive to the M5 is a slog it is not important enough in my opinion to warrant a bypass link, destroying our beautiful heritage.</p> <p>I do hope you will reconsider the need to destroy the lake, Backwell common and 'upgrade' our adequate station, in the name of improved infrastructure.</p> <p>Once destroyed there is no going back, these micro environments take years to establish and can not be recreated on a smaller scale for aesthetic purposes.</p>	
K WINDSOR		<p>I strongly object to the contents of the Local Plan, which is very premature given that the verdict on the Joint Spatial Plan is still unknown. In particular the plans regarding Backwell are totally inappropriate for a village of this size. The huge increase in housing would have a detrimental effect on the community and is in opposition to the approved Neighbourhood Plan which has already identified an appropriate and sustainable plan for increased housing. The huge development is also unlikely to deliver much affordable housing for local residents. The proposal to develop Backwell as a Transport Hub would mean the village would be surrounded by busy roads and dual carriageways cut through greenfield sites, and increased facilities at the station would bring further congestion and parking issues on the village roads. The possible proposal to bar through traffic on Station Road between Backwell and Nailsea is also alarming as this is our main access route. All this increased traffic will mean extra congestion and pollution and loss of greenfield sites and damage to the Backwell Lake area. In addition where will the funds be for these infrastructure costs? The village already has pressure on its existing services and the proposed huge housing development would bring further stress on these and, due to lack of local employment, Backwell will become yet another commuter town. In addition the council is unwilling to consider alternative sites such as The Vale where a link road has already been built at considerable expense. This area is also much closer to Bristol, reducing traffic and employment issues. This plan would have a serious detrimental effect on Backwell and completely alter the character of the village.</p>	
Kate S		<p>The North Somerset Local Plan is highly flawed in very many ways. I write at this point with regard to the plans for Backwell and Nailsea and would like to express my very strong objections. The scale and locations of development are totally inappropriate to what is essentially a rural setting. Backwell is a VILLAGE. The proposal to increase the size of the village by 700 houses is outrageous and will destroy the very nature and character of the village. There is totally insufficient attention focussed on infrastructure, transport and education provision - all of which are stretched to capacity at present.</p>	

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		<p>The idea of turning Backwell into a Transport Hub without any clear indication as what the transport links would be is ill-conceived. Further attention should be focussed on building the required housing in areas such as the Vale near Long Ashton, where public transport into the city would be significantly more cost-effective and sustainable. The area where the Backwell Transport Hub is proposed is close to a scenic lake and highly valuable wildlife resource - the proposed developments could destroy these habitats. The housing development is proposed on high quality agricultural land which would be lost from production forever.</p> <p>I feel that the plan is flawed, incomplete and unsustainable on so many points.</p>	
Kath		<p>The fact that you (NSC) are spending a lot of money on this local plan before the JSP has even been considered this matter is DEEPLY troubling. Is it that you don't care what anyone thinks? Is there an agenda we should know about? Is it that you are that arrogant that you think it's a done deal regardless? It's very hard to trust an organisation where skulduggery seems to be so open.</p> <p>It's so unfair that NSC are putting residents under unnecessary stress before the JSP. It's not healthy to have this issue hanging over us.</p> <p>For Backwell. A massive road, destruction of wildlife, noise, light pollution, a multistory carpark. Really?! Come come now, is that right that people who have been living in a peaceful village now have to live in a transport hub?! To think people will sit back and give you a big thumbs up whilst you violate them is frankly laughable.</p> <p>It would seem that Backwell would be paying an extremely high price. Taking on a lot of heavy lifting in terms of traffic and building. It basically means that we won't exist anymore. It's TOTALLY disproportionate. Below is a very short list of the issues.</p> <ul style="list-style-type: none"> • 700 Houses on Grove Farm doubling our population • Car Park Expansion at Nailsea & Backwell Train Station • Park & Ride for Trains and Metrobus • Backwell becoming a "Transport Hub" serving a much wider area • A Link Road and Metro Bus (lite) Road linking the Nailsea SW development to Backwell and eventually going on to the M5 at Clevedon • Road running next to Backwell Lake and out onto Station Road. Bringing traffic in from the Motorway and surrounding areas • A New access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell. • New access roads at Rodney Road and Moor Lane on to Grove Farm • New roads linking Nailsea. (depending on where Nailsea's 3,200 new houses are allocated). • Noise • Light pollution • Stress and extinction of some of our local wildlife including bats, Kingfishers, Otters etc <p>I could go on, but I know that you know all this. You just don't care</p>	
Katie W		<p>These proposals will effectively turn our village in to a town. The statement that other than a primary school, most other facilities needed to support a further 700 households are already here, is quite frankly laughable. This has obviously been written by someone who has never visited us! The largest shop we have is a basic Spar!</p> <p>I have real concerns about the environmental impact of the new development on the maternity roost of greater and lesser horseshoe bats - and I have yet to read anything that makes me feel that this is being considered. We all know that in order for this land to be viable feeding grounds for the bats and their young it needs to be a working farm. Providing migration corridors will not help provide the sustenance that the bats need when growing and unable to venture too far from the roost.</p> <p>I walk my dog on the land of Grove Farm every day. During the winter the fields are often water logged. Adding 700 houses on to this land could prove a real flooding risk. Backwell Common is also a flood plain so how it can support a 4 lane road I can't imagine and what the cost implications of that will be is just beyond comprehension.</p>	

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		<p>Access to the Grove Farm development is also a massive problem; it's impossible to imagine how that can work. The A370 is already at maximum capacity - with traffic crawling through Backwell at rush hour. Rodney Road is a small, residential road that is already jam packed with traffic - how access to 700 houses can be incorporated there without real risk of pedestrian accidents I can't imagine. Access via Moor Lane is nothing short of ludicrous. Moor Lane is a single track road due to inconsiderate railway station parking - (and please don't mention a monstrous multi-story carpark next to our beautiful lake. If people won't pay to park in the carpark already there - they won't pay to park in a massive multi-story) - to compound the problem we now have a 70 house development opening out on to Moor Lane as well as all the traffic from Long Thorn, all spilling out on to Station Road which is the main route to a Secondary school with all the pedestrian issues involved with that! Modifications to Station Road have been mentioned but it can't be made wider - which is what is needed to make it safe for pedestrians.</p> <p>To summarise, the JSP is fundamentally flawed. We categorically reject NSC's proposals to overrun our village with traffic we cannot cope with and homes that we cannot support. There are no employment opportunities here - everyone will need to commute, with the environmental impact that brings. Do not think that the people who live here respect your decision to push these plans through in such an underhand way and please don't think we will accept 700 houses and unwanted roads foisted on us quietly and without a very loud fight.</p>	
Keith Riches		<p>Mention is made of Backwell's Neighbourhood Plan which is due to expire in 2026. The paragraph states that Neighbourhood Plans sit alongside the Local Plan and carry the same weight. It is therefore inappropriate to propose a major housing development on the western edge of Backwell before 2026 which is not in the Neighbourhood Plan. Page 20. <i>Service Village</i>. Backwell is listed as a Service Village in CS32 (and on page page 25). On this basis it should not have been considered as a Strategic Development Location in the first place.</p> <p>Page 28 '<i>Garden Villages and new communities</i>.' Why 'Garden Village'? It is an absurd title; why not new town or village? There is no definition of a 'new community'. This is important because the proposed SDL at Backwell is described on this page as a new community, but on page 50 it says 'The development would need to be sensitively designed to integrate with the village'. Which is it? More clarity is needed.</p> <p>Page 30. '<i>Nailsea and Backwell Transport Schemes</i>'. This section contains many possible road schemes which require considerably more detailed investigation, not to mention costing. We are sceptical about the claim that the new 'link' road would offer congestion relief to Backwell Crossroads and A370 – it might just result in slightly shorter tailbacks on Station Road and longer ones on the A370. In our view, if new development takes place in this area on the scale proposed, the congestion will only get worse, even if the new roads can be funded and built in advance. Page 50. 'Context' - as mentioned at Page 28 above – is it to be 'integrated' or a 'new community'?</p> <p>'Critical issues raised through consultation' - it is reassuring that all these criticisms of the JSP have been noted. The proper response is change, not mitigation.</p> <p>Page 51. Q19. '<i>Proposed vision for development</i>' - 'Vision' is not a word we consider appropriate in a 'Plan'. Comments about 'relieving pressure on Backwell Crossroads' - as Page 30 above.</p> <p>Pages 51/52 Q20. '<i>How the principles are developing</i>'.</p> <p>'<i>Development to be well related into the existing village</i>' - We are not sure what this statement means.</p>	<p>ISP JST comment 2016 Riches.pdf (42 KB)</p> <p>ISP comment 2017 Riches.pdf (52 KB)</p>

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		<p><i>New Station Road - A370 link</i> - Is only shown on the map on Page 58 in the vaguest terms but it inevitably involves taking more Green Belt out of agricultural use and ruining the character of Backwell Common. We question whether the new link road would be ‘delivered in advance of development’. Later, the penultimate statement in this section of developing principles says ‘<i>Station Road will be improved with a new access to the A370 helping to address congestion at Backwell Crossroads</i>’. <i>This statement is confusing in relation to earlier points.</i></p> <p>General comments on other points in this section - It is self evident that 40% more dwellings in one development will totally change the nature of the village. The JSP proposal for this SDL would involve taking a large tract of good quality land out of agricultural use and utterly change the setting of the west end of Backwell. It is therefore depressing and upsetting that most of the bullet points in this section propose measures and mitigations which would be more relevant to the specification of a theme park. This is all rather insulting to residents who cherish the current character and setting of the village. It also indicates just how desperate the planning authorities are to ‘make it alright’.</p> <p>Point relating to ecological habitat mitigation – This is a vague statement of gobbledeygook. The Local Plan must address these important issues in full.</p> <p>The final point talks of a new primary school within the development; it is to be hoped that there would be an overall appraisal of Backwell’s schooling needs.</p> <p>Page 53. Is this photograph intended to be indicative of a ‘development well related into the existing village’? Very worrying.</p> <p>Page 58/59. It is reassuring that point 2 mentions retention of the strategic gap. However, the new road, an enlarged (or multi-storey?) station car park and road junction would reduce the strategic gap to a sliver and have a serious negative impact on the environs of Backwell Lake and its increasingly significant associated wildlife habitats.</p> <p>Page 69/70. ‘<i>North Somerset economy</i>’. Rich farmland is mentioned, presumably as an important asset. However, under ‘Role of the Local Plan’ there is no explanation of how all the proposed development will ‘safeguard’ agricultural businesses.</p> <p>Page 74 to 79. <i>Bristol Airport</i>. We have commented separately on plans for airport expansion. Noting noise and pollution issues, and the remorseless increase in associated surface transport, we have serious doubts about continuing airport expansion.</p> <p>Page 80 to 84. <i>Transport</i>. The issues are fairly clear – the visionary ideas to deal with these challenges are a long way short of a Plan and appear to be completely unaffordable. We await the JLTP with interest.</p> <p>Page 86. <i>Self-Build Policy</i>. This is a welcome inclusion and we hope it is taken forward into the Local Plan.</p> <p>Page 86. <i>Affordable Housing</i>. We consider it absolutely vital to place as much emphasis as possible on facilitating the availability of truly affordable housing. There are many new, cheaper building techniques which large developers seem very slow to embrace.</p> <p>Page 92. Q54. Household Waste Recycling Centres. It is to be hoped that provision will be reviewed in the light of eventual plans for new development. The site at Backwell is not in a suitable location.</p> <p>In Conclusion</p>	

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		<p>Giving the opportunity for wide consultation at this stage of producing the Local Plan is appreciated and for the most part the <i>Issues and Options Document</i> is well presented. Unfortunately this document is based upon the JSP which contains serious flaws and is both unsustainable and unsound. We look forward to commenting on the draft Local Plan.</p>	
L. Golding		<p>Re-the above plans specifically for Backwell, it seems as if you are wanting to build a new town from a small village with many small village accesses.</p> <p>Building so many new houses at Grove Farm needs great deal of thought, rather than just drawing circles around an open space.</p> <p>Haven't the planning dept noticed plenty of new developments happening in and around Nailsea & Backwell, its not just the six hundred houses being built the natural increase of the village seems to have gone by un-noticed.</p> <p>With regards to destroying the environment, wild life, peoples lives its during and afterwards the chaos,we have a quarry on the A38 and Tarmac on the A370 a building site for 600 houses the two roads mentioned are arterial routes into Bristol this Plan 2036 is madness.</p> <p>When there is a problem on the M5 to A370 and A38 both become gridlocked, adding a new road across Backwell Common will just mean one more grid-locked road.</p> <p>Our family (my wife and 4 children) have all previously replied in detail to the above plans, I presume you are referring back to all those previous comments when you are making decisions, we do not really understand why we need to say the same things again and more!</p>	
L. Sparey		<p>The fact that you (NSC) are spending a lot of money on this local plan before the JSP has even been considered this matter is DEEPLY troubling. Is it that you don't care what anyone thinks? Is there an agenda we should know about? Is it that you are that arrogant that you think it's a done deal regardless? It's very hard to trust an organisation where skulduggery seems to be so open.</p> <p>It's so unfair that NSC are putting residents under unnecessary stress before the JSP. It's not healthy to have this issue hanging over us.</p> <p>For Backwell. A massive road, destruction of wildlife, noise, light pollution, a multistory carpark. Really?! Come come now, is that right that people who have been living in a peaceful village now have to live in a transport hub?! To think people will sit back and give you a big thumbs up whilst you violate them is frankly laughable.</p> <p>It would seem that Backwell would be paying an extremely high price. Taking on a lot of heavy lifting in terms of traffic and building. It basically means that we won't exist anymore. It's TOTALLY disproportionate. Below is a very short list of the issues.</p> <ul style="list-style-type: none"> • 700 Houses on Grove Farm doubling our population • Car Park Expansion at Nailsea & Backwell Train Station • Park & Ride for Trains and Metrobus • Backwell becoming a "Transport Hub" serving a much wider area • A Link Road and Metro Bus (lite) Road linking the Nailsea SW development to Backwell and eventually going on to the M5 at Clevedon • Road running next to Backwell Lake and out onto Station Road. Bringing traffic in from the Motorway and surrounding areas • A New access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell. • New access roads at Rodney Road and Moor Lane on to Grove Farm • New roads linking Nailsea (depending on where Nailsea's 3,200 new houses are allocated). • Noise 	

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Lesley Hegarty		I have the same objections to this as to the Mendip Spring Garden Village. It is fundamentally flawed and will be found to be unsound at the JSP examination.	
Lisa Flower		<p>I am a resident of Backwell and I would like to oppose the policies within the JSP that will alter the village beyond recognition.</p> <p>The plans will double the size of our village overnight, and the impact on recourses and facilities will be catastrophic.</p> <p>Building a massive new multi lane road across Backwell common, with the resulting loss of farmland and wildlife defies logic.</p> <p>The traffic through our village is already a breaking point. Perhaps the people involved in coming up with the suggestions within the JSP should come and take a look around and see what we are already dealing with before suggesting an increase in traffic.</p> <p>Where is the funding coming from to build all of this? Has anyone considered it at all?</p>	
Local Access Forum	Local Access Forum	There is a good bridleway network on Backwell Hill but it is difficult to access due to the problems crossing the busy A370. The same goes for the network of bridleways on Cleve Hill. Consequently, much care should be given to infrastructure that will allow all vulnerable road users to cross the A370 and access that network. At the same time, any new walking/cycling paths should be dedicated as multi-user to ensure maximum use – and safety. Particular care should be made to ensure that new build areas are linked also to the Festival Way path through to Bristol. This will also help to encourage more people to use it.	
Long Ashton Parish Council	Long Ashton Parish Council	Agree with overall concept.	
Lorraine H-P		<p>It is outrageous and premature to say the least, that North Somerset Council should be spending time and money considering this Local Plan in advance of the JSP even being looked at and inspected next year. The proposals to increase the size of Backwell by almost double in one foul swoop are completely unsustainable and reckless. The Local Plan is a wordy document written in council speak which means little to most people. What it will mean if implemented is that Backwell will no longer be a Village but a Transport Hub (as suggested in the Plan), serving the Motorway (M5 at J19/20) and surrounding areas, with more traffic, more pollution and 700 more houses, all vying for position on the already congested A370. North Somerset Council seem happy to propose "Tinkering" with the Green Belt in Villages like Backwell, but yet refuse to consider ALL options within their control. They are prepared to see a Link Road next to Backwell Lake, linking traffic (including Metro Bus) to Clevedon and the Motorway. Another Link Road (including Metro Bus) crossing unstable moorland, greenbelt and agricultural land on to one of the most ancient parts of Backwell at Backwell Common. A road crossing over or under the railway line and emerging next to Flax Bourton & Backwell Cricket Club, opposite Stancombe Quarry, which already has hundreds of lorries emerging every day. Expanding the Car Park at Nailsea & Backwell Train Station with a Multi Level Car Park, in effect turning the Train Station and our Village in to a "Park and Ride". The Local Plan talks about supporting and enhancing the Village Centre and addressing traffic issues on the A370, yet there is no substance or costings for any of this, indeed building more roads and more houses, will only add to the problem, and how does any of this enhance the Centre of our Village?. North Somerset Council seem to think that the Village of Backwell has sufficient employment and services, such as Doctors and Dentist etc to support thousands of extra people, yet</p>	

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		<p>the reality we know will be that the vast majority will commute in to Bristol, (particularly if the linked transport document which suggests closing Station Road under the Railway bridge is implemented!), and what of local services?. Backwell is a Village, it has a Village Neighbourhood plan, which has looked carefully at sustainable growth, which is in proportion to the Village, 100 new houses all given planning, all planned, all costed, all sustainable, all proportionate to the size of Backwell. That, North Somerset Council is a PLAN! Your Local Plan or "Issues and Options" document does indeed have a number of "Issues", which I object to in the strongest possible terms.</p>	
M Blake		<p>I do not believe the JSP (hereafter 'the plan') is sound for at least the following reasons:</p> <p>The plan is not consistent with the national planning policy. The plan does not take into account the need to review the Green Belt in providing long-term capacity for growth in a sustainable manner. As such, the plan is not a sustainable development, which is the essential aim of national planning policy.</p> <p>The plan is not justified as it has not been tested against all reasonable alternatives. For example, "The Vale" would be a far more suitable location, much closer to Bristol. The Vale development would require a shorter commute into Bristol, would not destroy useful agricultural land, would require far less governmental funding, would put less strain on the existing infrastructure such as the A370 and cause less resultant air pollution.</p> <p>The plan is not effective as it will not be delivered by 2036. The required road infrastructure is merely a proposed line on a map. The required (proposed) road has no governmental funding, has not been costed, a cost which is likely to be prohibitive due to having to build on inherently unstable moorland. As such, at present, the proposed road is no more than a fantasy. The required (proposed) road also has the potential to adversely affect (possibly damage or spoil) listed buildings, such as Grade I listed buildings e.g. Church of St Bridget and the Tyntesfield Estate. The plan is also unrealistic given the reliance on the building of 900 homes per year towards the later end of the plan, to meet the projected housing needs by 2036. The plan's build rate at that time far exceeds those achieve since 2008.</p> <p>The plan is not positively prepared in meeting the housing needs of North Somerset in a sustainable way. It would negatively affect protected buildings and landscapes, require the construction of substantial new roads to handle the increase flows of traffic (none of which have even been costed, see above), and will fail to integrate with the existing host community, and imposes a burden on the existing infrastructure with no proper support for existing shops and businesses.</p>	
M Blake		<p>In particular, the plan to build 700 new homes at Grove Farm in Backwell is gross and disproportional, increasing the size of the village by nearly 40-50%, and would negatively affect the character of the village. No community the size of Backwell should be forced to bear a relative burden of this size. It is simply unfair. It would be like asking Bristol to accommodate 180,000 new people, those people's homes being located on a vital communication line, and with no other means of support.</p> <p>The plan also does not properly consider (*in the absence of building new roads*), how the increase in traffic along the A370 will adversely affect the communities lying on, or close to, the A370, e.g. Long Ashton, Barrow Gurney, Flax Bourton, Backwell, Nailsea, Failand, Wraxall, Chelvey, Brockley, Cleeve, Claverham, Clevedon, Yatton, Wrington, Congresbury, etc. The Flow of traffic to all these areas would be badly affected, particularly at peak travel times, and would result in increased air pollution, not to mention lowered economic efficiency due to lost work hours.</p> <p>By way of context, I currently commute into central Bristol from Backwell, and at peak travel times my commute can often take over an hour each way. Backwell is only about 8 miles from Bristol. This is already a ludicrous amount of time to spend in traffic, giving an average speed of about 8 mile per hour. Building 700 homes at Grove Farm would choke the A370 to a virtual standstill at peak times. Before 700 new houses could be built at Grove Farm, a funded transport solution *needs* to be in place (and not merely proposed).</p> <p>Hoping that a new road will be funded and built on inherently unstable marshland is not a "plan"</p> <p>The proposed '<u>mitigation measures</u>' (such as blocking Station Road, the main route that connects Backwell and Nailsea, thus preventing essential services such as the Fire Brigade and police reaching Backwell efficiently, are ill thought out and dangerous, not to mentioned the economic damage this would cause; and the other measure are too costly to ever get funded and would damage greenbelt land and/or good agricultural land) go no way to addressing the underlying problems that this 'plan' would cause. These proposed 'mitigation measures', as far as I'm concerned, are no more than disingenuous diversions. In modern parlance 'Fake News'.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		The JSP is a disaster and should be abandoned.	
M Kemp		<p>The Joint Spatial Plan (JSP) is still in a consultation phase and the conclusion unknown as to what will be in the JSP. NSC should not be taking it as a foregone conclusion that JSP will be accepted in its entirety and therefore they should not be asking for comments on a local plan which is based on a yet unknown JSP. It is a waste to time and money to jump the gun and produce a local plan for North Somerset.</p> <ul style="list-style-type: none"> • The proposal for a Strategic Development Location of 700 houses at Grove Farm would completely change the character of the village of Backwell, increasing the size by approximately 40% which will result in the loss of identity as a village. • No evidence has been provided for the proposed new school near Grove Farm in terms of a plan for all of Backwell's schools in the enlarged village. • The proposals for 700 houses at Grove Farm and a significantly larger development at Nailsea will increase the volumes of traffic through Backwell no matter what other roads (one of which is on greenbelt through Backwell Common) or transport measures are introduced. These will require large scale investment and need to be in place before any development. • Investment in infrastructure has already been put in place – South Bristol Link Road and the new Long Ashton Metro. Proper consideration should be given to the Vale proposal as a suitable location for a large-scale development as this site is much closer to far more employment minimising the need to commute greater distances even if this involves a review of greenbelt. 	
Mark Funnell, Planning Adviser, National Trust	National Trust	Our comments on the Joint Spatial Plan publication document in January 2018 remain relevant, and included the following: “We are very concerned about the proposal for a new road link between the A370 Long Ashton bypass and the M5 motorway, which is stated as being ‘critical infrastructure’ for the new housing being proposed at Nailsea and Backwell. We question the appropriateness of these proposals and their sustainability given the reliance on new road infrastructure, which would also cause considerable harm within the Green Belt and to designated heritage assets”. Those concerns continue to apply in respect of the scale and implications of proposed development at Nailsea and Backwell.	
Mary Woodgate		<p>To make a small village like Backwell become a transport hub is to destroy the very nature of the area and, it seems to me is ill-thought out. Surely a more likely place for a transport hub is Bristol Airport which is crying out for a better link to the Bristol infrastructure of Temple Meads and the M4/5 and a more obvious Metro Bus line. It is also far less intrusive on the lives of people in the area. I find it bizarre in the extreme that you would prefer to have yet another blot on the North Somerset landscape when there is already an existing one that can be slightly, in comparison, expanded.</p> <p>I find your proposals for any of the following monstrous:</p> <ul style="list-style-type: none"> - Carve through Backwell with a major road, a motorway link, - Carve through Backwell with a ‘metro bus’ route (which will no doubt be as wasteful as the new empty one already built in Ashton) - Build a multi storey car park right next to a local beauty spot and leisure area. - Build 700 houses thus doubling the size of a small and close community village. - Designate a whole village, with a major and successful school, to be a Transport Hub. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Are you all that insensitive or is it that none of you live in this area? Can you not see what a road coming straight through Backwell, across Backwell Common and off through Flax Bourton will do to the area? You act as if 'Transport Hub' is some sort of honour, a medal to be proudly worn but instead it will ruin part of rural England that we treasure.</p> <p>Please rethink this unpleasant scheme and stop wasting tax payer's money on further development of it.</p>	
Michael Phillis		<p>1) we are long term residents of Backwell having moved here in 1978 and we have no plans to change that status given that this community is so well balanced and provides all of the facilities required</p> <p>2) it is apparent that the Joint Spatial Plan (JSP) is still in the consultation phase so it is too premature for the North Somerset Council (NSC) to propose how the draft JSP could be implemented within the NSC area</p> <p>3) the JSP/LP proposals for a Strategic Development Location of 700 houses at Grove Farm would completely destroy the existing village, one that works and already achieves the ideal for a community. The proposal which amounts to something like a 40% increase would be devastating to all aspects of life in the village and to all residents and that would certainly include the new arrivals.</p> <p>4) It is noted a new school is included within the proposed houses but that does not appear to be supported by any evidence from a coherent strategy plan for Backwell schools in the enlarged residential area</p> <p>5) The JSP & LP proposes a new road across Backwell Common Green Belt, creation of a "Transport Hub" at Backwell Station and "improvements" to Backwell Cross Roads. The large development proposals at Grove Farm and the even larger numbers proposed in Nailsea and elsewhere will only significantly increase traffic on roads and lanes around Backwell despite new roads being planned. The proposals in reality will only bring sprawl and a permanent state of gridlock far removed from the existing community experience and far removed from surely the planned objective</p> <p>6) The other concern is that there is a total lack of clarity on how these expensive infrastructures will be funded especially as they are essentially a pre requisite to any other development taking place</p> <p>7) So far we have not seen any proper consideration of "The Vale" as an alternative development area. That location is already serviced by the newly completed South Bristol Link Road and the MetroBus service. It is closer to employment opportunities thus reducing commuting traffic and geographically and visually more suited to development being a natural extension to Bristol. There is extensive land available outside "The Vale" to reinstate a suitable green belt barrier without causing other conflicting proximity issues.</p>	
Miriam		<p>I object to the proposed location of 700 houses at Backwell and most strongly to the Transport Hub and proposals of new link roads. I do not feel that there has been proper consideration of The Vale (near the South Bristol Link Road) as a suitable location for development. NSC seems to disregard this area for some reason and I would ask that this rationale be shared publicly or if already available that more signposting to any relevant documents be more visible. The Vale site is closer to the source of most of the local employment, already has a better road network to access the area, to Bristol, to the airport and roads that could take a volume of traffic to and from the motorway network and would therefore minimise the utter destruction of Backwell and reduce commuting traffic using the A370 or these proposed new roads to the airport that would essentially turn the village of Backwell into a town and cause enormous destruction putting in large roads for access. A comprehensive Green Belt Review is required and Backwell should be afforded better protection. If the existing local bus and train services were improved transport to and from the surrounding villages would be more accessible and affordable but this doesn't require the building of a transport hub in a flood plane and the destruction of a village!</p>	
MLC		<p>Please see attachment.</p>	<p>019.docx (13 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
Mr and Mrs Crooks		<p>Please find our comments on the local plan 2036 issues and options consultation. My husband and I both attempted to use the North Somerset council website to feedback our comments, but were yet again let down by technical issues your website, which prevented us from commenting in this way. We have included our comments below, but were disappointed that the website did not seem to be working on the final day for comments on the Local Plan.</p> <p>We feel that it is very premature of the council to be spending time and money in developing a Local Plan based on the Joint Spacial Plan, which has yet to be approved.</p> <p>In response to question 19 (vision for Backwell):</p> <ul style="list-style-type: none"> - An expansion of this magnitude will destroy the character of the village and basically turn Backwell into a commuter town/transport hub for Bristol. - Backwell already has an adopted village neighbourhood plan, which identifies sites for development in a sustainable manner and which are in proportion to the size of the village. This has been ignored by the Local Plan. - We don't feel that the concerns raised in the initial consultation have been addressed satisfactorily. 	
Mr and Mrs Elliott		<p>Unfortunately I have been unable to submit my comments regarding the Local Plan on line and therefore wish to do so via this e mail.</p> <p>Firstly I do not understand the logic of NSC attempting to complete the Local Plan before the final outcome of the JSP?</p> <p>Also it appears that NSC are not accepting that there is a lot of opposition to both the JSP and the Local Plan and the voice of the people is being ignored. Little consideration appears to have been given to Backwell Parish Councils Local Plan.</p> <p>I vigorously object to the Local Plan and specifically the proposed development of 700 houses at Grove Farm, Backwell. This size of development would increase the population of the village in excess of 40% with out other developments that have already been given planning approval, c.100 homes.</p> <p>The village of Backwell is small and does not have the infrastructure or facilities necessary to support this level of increase i.e. medical, dentists, schools and other amenities. Explanations in the Local Plan to overcome these issues are at best vague and mainly not credible due to lack of meaningful explanation or supporting data. It is clear that it does not meet any target of sustainability due to its location, minimal nearby employment land and the need for extensive infrastructure requirements. There are other areas within North Somerset that are much more appropriate.</p> <p>The proposed transport infrastructure would not solve the high volume of traffic that currently uses the A370 through Backwell. In fact the proposed link road from the A370 to Grove Farm would result in increased traffic from Nailsea and other villages using Chelvey Road (which is unsuitable for heavy traffic as it is single lane in many places) to gain access to the A370 and thereby avoiding Station Road, Backwell. Changing the timing of the traffic lights at Backwell cross roads on its own would not mitigate the increased volume of traffic. Also, the increased population would mean increased usage of the pedestrian crossings slowing the traffic and creating more congestion and pollution.</p> <p>The planning appeal for Farleigh Fields and the proposed development of c.200 houses on the east side of Backwell avoiding the cross roads was this year rejected by The Secretary of State. So how can it be acceptable to build 700 houses on the west side of Backwell with all the increased traffic passing through the centre of the village??!!</p> <p>When would the infrastructure development start? Sadly, I suspect the developers will be given permission to commence before any infrastructure is in place and we will see a repeat of what has happened in Portishead!</p> <p>Also there would be a significant impact on the environment, increased pollution, impact on wild life including the protected Greater and Lesser Horse bat colony with its foraging area on Grove Farm.</p>	

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		<p>In view of the above issues it is clear that the plan is not positively prepared nor can it be justified as other potential sites have been ignored and not tested as viable alternatives.</p>	
Mr and Mrs Wells		<p>We commented on the JSP in January 2018 expressing our opposition to the proposed development of 700 houses in Backwell. We are very disappointed that the widespread opposition across North Somerset appears to have been ignored, and both the JSP and NSC Local Plan ignore the concerns but instead are concentrating on the detail of how the damage to our villages can be mitigated! There is no logic in putting housing on good agricultural land away from the main employment area in Bristol.</p> <p>Our main points are:</p> <ol style="list-style-type: none"> 1. 700 houses are a 40% increase on the size of Backwell. At present, Backwell has a well- balanced community, with excellent schools, medical services, community halls etc albeit with small crowded roads and limited parking in the village centre. It is difficult to imagine how the 40% increase could be accommodated. 2. There is no point in NSC wasting resources on fine tuning the unwelcome JSP, as we hope that the flawed Backwell section will be removed. 3. The infrastructure changes suggested are, if anything, more alarming than the houses themselves. Whatever spin is placed on the proposed "new Station Road", it will go from the attractive Backwell Lake area to Farleigh across Backwell Common and over or under the railway. This will damage the tranquillity of the Common, and the lake, both of which are hugely valued by residents. It is hard to see how Station Road, the A370 in Backwell and other roads can be improved even with huge expense, and great disruption to important routes over many years. 4. There is an alternative site at The Vale, which appears to have been ignored as it contains some land designated as Green Belt. This must be reviewed! Much of this land is of low amenity value and of little agriculture benefit. The idea of Green Belt is to be applauded, but its aims are not served by building in the countryside rather than adjacent to the new Bristol link road, which crosses Green Belt land, but is close to employment and transport facilities. The spirit of Green Belt rules would be served by building here rather than in the countryside outside Backwell. 5. Please consider the environment. Commuters from the Grove Farm site will have a journey of typically some 8 miles into Bristol. In contrast The Vale will be less than 2 miles, and so it is much more likely that people will walk, cycle or use public transport. Residents of The Vale would waste much less time travelling and have a smaller carbon footprint. If we do not damage North Somerset, they will be not far from excellent walking countryside. Under the proposed Local Plan, we will all be losers in an urbanisation of what we currently treasure. 	
Mr Michael Rose		<p>I wish to make comment on the above, on the understanding both that it is only a "discussion paper," which will, in due course, lead to the publication of a draft Local Plan, and also to my earlier reps to the West of England Authority challenging the validity of their draft JSP in the sections relevant to Backwell and Nailsea.</p> <p>My responses are targeted principally at Section 3 and Section 4.3 of the paper, and with particular reference to Backwell.</p> <p>I do not agree "Backwell will remain an attractive and vibrant village," by developing in the manner suggested.</p> <p>An increase of 40% in the housing stock, over a period of just a few years is far too great for a "service village" to absorb, will completely change its character and put far too much pressure on local services and amenities.</p> <p>A far more effective and sustainable solution for gradual growth of a smaller number of houses, across a variety of village sites would be a more logical way forward. This would be helped by the suggested logical amendments to both Green Belt and settlement boundaries.</p> <p>In summary, I believe the Backwell SDL has been promoted for the wrong reasons, is not sustainable and is not an appropriate solution for the development of 700 or more houses throughout the plan period.</p>	

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		In addition, in advance of the JSP Hearing in May, with the likely alterations to this draft document and the mass of associated technical papers, the promotion of a draft local Plan at this stage - which is predicated on the ideas in the JSP - is far too premature.	
Mr Michael Rose		<p><i>Roads and infrastructure</i></p> <p>A new development of 700 houses in Backwell could only become acceptable if significant infrastructure was built at the same time as, or ahead of, new housing development. Without this, current traffic problems in the village - notably at the A370/Station Road crossroads, and Station road itself - would be exacerbated. In particular it is noted a new road across the railway from Backwell to Nailsea, on the western edge - identified in the draft JSP - has been omitted, only worsening the ability to connect Backwell with Nailsea and its essential services.</p> <p>There is little attempt to explain in any detail how the congestion at A370 crossroads might be addressed.</p> <p>The suggestion of a new A370 relief road from Flax Bourton to the railway station would do very little to help motorists travelling from Bristol to Backwell, or those travelling on to Weston and the south. Indeed, it would be likely to just create one further bottleneck at the proposed Flax Bourton Junction.</p> <p>Above all, there is no proper detail on how any of this infrastructure might be funded, and I have serious doubts as to how this could be achieved.</p> <p><i>Schools</i></p> <p>The Paper appears to have no coherent long term strategy re education. It is suggested a Backwell SDL would include a new primary school. Backwell currently has two (infant and primary) located far apart, and a third, on a separate site (currently suggested at the western edge of the village), would be illogical, inefficient and difficult to manage. The secondary school is already full and a different strategy would be required here. Where is the strategic thinking?</p> <p><i>Agriculture</i></p> <p>The suggested Backwell SDL would result in the loss of a significant area of good quality- grades 1 - 3 - agricultural land. The Paper makes minimal reference to the effects arising from the loss of local food production areas. This is of particular note when other potential development sites in North Somerset, of far less agricultural value, have been ignored.</p>	
Mrs Judith Brown		<p>Plans are being proposed that would mean the size of Backwell almost doubles in one go including new roads/metro bus routes at Backwell Lake & Backwell Common. Whilst I appreciate that nationally there is a housing shortage, the plans to build 700 houses in Backwell in the manner and location which are being proposed, would utterly decimate the village. To include 700 houses, a new road from the lake side of the village to the airport, multi-level Car Park & Metro Bus Park & Ride at Nailsea & Backwell train station, would mean that Nailsea and Backwell are no longer separate entities and their individual characters would be lost entirely. This is in addition to the proposals to develop in excess of 2000 houses in Nailsea. What would result is a further town on the outskirts of Bristol as a major city.</p> <p>I agree that some new affordable houses should be built but not in this location and not at this scale. The transport hub and roads will create even more of a problem.</p> <p>The Vale, which has more space and an existing road network, gives a blank canvass for planning and future development, is close to a major rail network and the airport, but has been disregarded for some strange reason. Is it because it is currently classified as Green Belt? If this is the case then Green Belt should be reviewed as a matter of urgency.</p>	
N Cooper	Claverham Future	The JSP is nothing to do with 'Joint', absolutely zero cooperation in feeding the true employment centres or delivering infrastructure across the area have been demonstrated in NSC's plans. There should be no expectation that the local plan can be based upon the assertions of the JSP. Premature to have this discussion and consultation. If the inspector does not come up with the same view I will seriously question his judgement.	

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Nailsea Town Council	Nailsea Town Council	Any development to the south of the town must be highly sensitive to the impact on Backwell Lake, including ecology and visual amenity.	
Nailsea Unit Trust (c/o Ellandi LLP)	Williams Gallagher	We support the objective of local services and facilities being maintained within the existing village centre rather than trying to add a further local centre within the urban extension. This avoids splitting available expenditure thereby improving the vitality and viability of Backwell village centre.	
Natural England	Natural England	Natural England broadly supports the principles for the garden villages and urban extensions at Nailsea and Backwell; it will be critical however that further iterations of the options for these areas are informed by robust ecological evidence and supported by suitable strategic mitigation solutions, as outlined above.	
Nick		I am opposed to the expansion plan for Backwell in its current form. The plans are ill thought out and do not take into account better locations such as the Vale. Putting 700 homes next to an already congested road, the A370, with no detailed plans on extra infrastructure is irresponsible. We already have large amounts of congestion, on station road particularly and the whole A370, and nothing in this plan has a good answer to the issue of how adding an extra 700 homes with multiple cars will be appeased. Large roads next to the reservoir and transport hubs at the station will only mean more traffic. I am not against building extra homes in Backwell but it must be sustainable, well thought out and measured. Simply adding 700 homes to a small community which struggles with its current amount of residents is not well thought out or sensible for the future.	
Nicola Driscoll		<p>I am writing to you as I strongly object to the JSP and North Somerset Council's local plan with the proposal for seven hundred houses on Grove Farm in Backwell, in addition to the four lane link road/Metro Bus route planned to support this housing.</p> <p>The proposed seven hundred houses would result in a 40% increase in the population of Backwell (together with other applications this could rise to 50%), Backwell is a small village and does not have the infrastructure, facilities or employment to support this increase, the JSP is therefore not reasonable.</p> <p>Backwell is a small rural village and this increase would completely change its character, destroying our peaceful setting. As a family with two young children I feel that the increase in the volume of traffic will seriously impact on the quality of living, polluting the air and affecting the safety of our children. The increase in housing will also create more light pollution and change the character of our village completely. We chose to live in our village because of its size and beautiful surroundings. The impact of the ideas suggested would destroy this entirely. The common and area around Backwell lake provide homes to many creatures. The wildlife would suffer as a consequence of the new road.</p> <p>As a teacher who works in Bristol, I travel on the already over congested A370 to get to work in Bedminster Down. The road is currently not able to sustain the volume of traffic during term time, let alone support the massive influx of traffic resulting from the new homes. The proposed road would create a bottle neck around Flax Bourton and severely impact on the air quality and the amount of noise in our neighbourhood.</p> <p>The plan is not sustainable as it has not been tested against "all reasonable alternatives", which include "The Vale" a piece of greenbelt land just outside of Bristol which already has the infrastructure (a road and metro bus route) and is close to services and employment in Bristol. NSC is the only Council in the West of England which has not committed to a Greenbelt review, yet is happy to support a link road through untouched greenbelt in Backwell. The Plan is not consistent with national planning policy as it fails to recognise the need to review the Greenbelt to provide long term growth in a sustainable manner.</p> <p>It is not effective because it is not able to be delivered by 2036. The four lane link road and metro bus route has not been costed and no funding has been identified (with no certainty of Government funding). In addition there is no assessment of how the road/metro bus route would be built across unstable moor land, prone to flooding. Based on NSC previous build rates, the build rate for the seven hundred houses is unachievable. The transport links in Backwell are already stretched, with trains full to capacity. The</p>	

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		<p>sad fact that there isn't even access for disabled users on one of the platforms, does not fill me with confidence that funding for a road and transport would ever come to fruition. The proposals create a high volume of traffic from the M5 and surrounding areas which will heavily impact upon the serenity of our village.</p> <p>The loss of agricultural land and the need to demolish existing houses, some of which are listed, must also be considered. Families will lose their beloved homes and the beautiful landscape will be tarnished. Poor wildlife, including, otters, deer, badgers, foxes, bats and migrating birds, will lose their homes too. It is atrocious that such a poorly planned route into the city with so many faults, can even be considered acceptable in this day and age.</p> <p>It is not positively prepared to meet the housing needs of North Somerset in a sustainable manner and would have a devastating impact on protected landscapes, habitats and our community. I feel that the vague plans and poor manner in which the representatives proposed them, shows a lack of competence which does not provide us with any faith that the proposals will be met and affordable housing be produced. My main concern is the severe impact this will have on a quiet village in a rural setting. Please consider these points, I understand that housing needs to be built but not on such an unrealistically vast scale without the consideration of the necessary funding and infrastructure. Local schools and doctors are already oversubscribed and these issues need to be factored in. Backwell should remain a village and any additional housing be on a scale of only a minor, sympathetic increase which does not affect our beautiful green surroundings.</p>	
O Gillespie		<p>Backwell has a very good well thought out Neighbourhood plan involving sustainable growth of housing - already 100 new houses incorporated into the village...This is now being superseded by the Local Plan in advance of the JSP being considered!! Why? Surely you should wait and see what happens with the JSP next year.</p> <p>The new plan will turn Backwell from a village into a transport hub with an added housing estate - totally decimating the village, our community and our wildlife. Apart from ruining the wonderful Backwell Lake full of wildlife and well used by locals, and destroying the greenbelt, good agricultural land and one of the most ancient parts of the village (Backwell Common) with a link road, it will add traffic to the already busy A370 (see it on a Friday when the M5 has problems).</p> <p>How is it that it's considered possible to interfere with our greenbelt but not with the greenbelt near the Vale (which is of very low agricultural quality land) already compromised by the South Bristol Link Road on one side and Bristol on the other. This is the most obvious place to build more houses, closer to employment - and would mean less commuting which makes better sense. <u>This should be seriously considered.</u></p> <p>Doubling the size of Backwell will obviously affect its character but if there is a link from the M5, and a new park and ride, plus any possible new transport links to the airport there will be nothing left of our Backwell - it will be totally surrounded by roads which will bring in more traffic which will make the A370 even worse. Backwell as we know it will have gone - it certainly won't be the "attractive and vibrant" village you describe - it will become a suburban sprawl with no identity.</p> <p>And of course Backwell will be negatively affected by over 3000 houses being built in Nailsea too. Already I have a lot of Nailsea traffic taking a short cut along my road to the A370 - this will only get worse.</p>	
P Child		<p>I wish to object in the strongest terms to the proposed Backwell development.</p> <p>A massive road, destruction of wildlife, noise, light pollution, a multistory carpark.</p> <p>You are proposing changing an entire village into a transport hub. This can surely not be seen as anything but catastrophic for the character of the village. What plan is there for services beyond a new school? What happens if the houses are built but there isn't adequate funding found for the transport system? Why isn't there a plan for these scenarios?</p> <p>Can you give a single detailed example of a case where a development has doubled the size of a village in one go without adequate transport infrastructure? Surely like-for-like case studies to illustrate that this can actually work would be essential, yet they aren't included in your proposal. Why is that?</p>	

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		<p>The above are not rethorical questions, I'd appreciate an answer please.</p> <p>It would seem that Backwell would be paying an extremely high price. Taking on a lot of heavy lifting in terms of traffic and building. It fundamentally means that Backwell won't exist anymore. Below is a short list of the issues.</p> <ul style="list-style-type: none"> • 700 Houses on Grove Farm doubling our population • Car Park Expansion at Nailsea & Backwell Train Station • Park & Ride for Trains and Metrobus • Backwell becoming a "Transport Hub" serving a much wider area • A Link Road and Metro Bus (lite) Road linking the Nailsea SW development to Backwell and eventually going on to the M5 at Clevedon • Road running next to Backwell Lake and out onto Station Road. Bringing traffic in from the Motorway and surrounding areas • A New access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell. • New access roads at Rodney Road and Moor Lane on to Grove Farm • New roads linking Nailsea. (depending on where Nailsea's 3,200 new houses are allocated). • Noise • Light pollution • Stress and extinction of some of our local wildlife including bats, Kingfishers, Otters etc 	
P Windsor		<p>I strongly object to the contents of this Local Plan, which is itself premature given that the verdict on the Joint Spatial Plan is still awaited. In particular the plans to expand Backwell and Nailsea are ill thought out and inappropriate for these settlements. The huge increase in housing proposed for Backwell is totally inappropriate for a village of this size and would have a completely detrimental effect on the community. It is in complete opposition to the existing Backwell Neighbourhood Plan which has identified an appropriate and sustainable increase in housing. This new proposed housing development is also unlikely to deliver much affordable housing as the building companies seek to maximise their profits. The proposed development of Backwell as a Transport Hub would mean the village would be surrounded by busy dual carriageway roads cut across greenfield sites, and increased facilities at the railway station would increase traffic and parking issues in this area. The possible proposal to bar traffic travelling between Backwell and Nailsea via Station Road/the railway bridge is also alarming as this is the main access route. The proposals would mean the loss of access to greenfield sites for existing residents and completely alter the character of the village. All the increased traffic will mean extra congestion and pollution, with loss of greenfield sites and damage to the Backwell Lake area. In addition, where are the funds available to pay for all the necessary infrastructure? The village already has pressure on its existing services and the huge housing development proposed would mean further stress on these and, due to lack of local employment, Backwell would become yet another commuter town. In addition, the council is unwilling to consider alternative sites such as The Vale, where a link road has already been built at considerable expense. This area is also closer to Bristol, reducing traffic and employment issues. This plan would have a serious detrimental effect on the village of Backwell.</p>	
petebutt		<p>There is nothing in any new consultations to provide me with any confidence NSC are listening to local people in Backwell and surrounding areas. The proposed development will only turn Backwell from a small village into a massive car park and transport hub for those people needing to commute to Bristol or Weston for their work commitments and it's only those people who will benefit from any such proposal and at what costs?</p> <p>NSC are fully aware the JSP is not popular with the majority of residents who feel they are not being listened to and despite many comments made a year ago NSC are still ploughing ahead regardless.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>I therefore feel it necessary to reiterate some of the main points already made previously so in summary please see below:-</p> <ol style="list-style-type: none"> 1. Why are NSC jumping the gun before this plan has been reviewed by Government Inspectors? 2. The 700 houses planned to be built on Grove Farm will increase a small respected and cherished village by 40%. It does NOT reflect the agreed expansion under the Neighbourhood Plan (which was given a seal of approval by the Government) and will destroy the village feel. 3. The loss of arable agricultural land will result in the destruction of valuable food producing services this area provides, this area also provides valuable resources to many species of endangered wildlife including the Greater Horseshoe Bat which has a well established colony at Brockley Hall Stables and need farmland to continue to exist. The JSP proposal for mitigating this issue does NOT comply with relevant habitat regulations! 4. To reduce additional traffic congestion that would be created by such a major development it will require massive new infrastructure i.e. roads, drainage, bridges across flood plains, plus expanding GP surgeries and schools – the JSP does NOT explain how this would be achieved, I can see are no plans for flood prevention, damage to greenbelt and destruction of nature conservation especially around Backwell lake and surrounding villages of Brockley and Chelvey. 5. Where are the long term job prospects in this area? 6. How will NSC ensure any building complies with the 35% affordable housing set by the government? 7. Why won't NSC reconsider the Vale – yes it's greenbelt BUT has already been compromised by a £220m+ spend on a new metro bus route via the new South Bristol link road. This is where the main employment is and seems crazy to build so far away from this point with no one bothering to explain how this massive expense would be funded? <p>I along with many residents understand there is a need to build additional housing but these must be built in the right location so please therefore ensure my concerns are documented and taken into consideration.</p>	
Phil		<p>I am writing to voice my concerns regarding the published local plan. Firstly, this is premature and potentially a huge waste of public funds as the JSP has yet to be looked at by government inspectors.</p> <p>The increase in housing suggested for both Backwell and Nailsea will totally alter the nature of the area. The proposed housing is not appropriate for a community the size of Backwell, almost doubling its size in one act. There is also not adequate infrastructure to support such a large increase in population. Further, as most people would be likely to commute into Bristol, it is environmentally unsound to build at a distance from the city when other sites much nearer have been identified.</p> <p>It will inevitably lead to the destruction of much wildlife and greenery. Backwell Common is a very rural area at present which is loved and enjoyed by many. To build a major road along the common would ruin this.</p> <p>The suggested road and bus links will also lead to a very significant increase in traffic through Backwell. The A370 is already inadequate to cope with current traffic levels and the plans do not attempt to address this.</p>	
Portishead Town Council	Portishead Town Council	Concern that the highway proposals will exacerbate Portishead's commuting transport issues.	
R Danson			

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The plans are quite simply, ill thought out, disproportionate, exceptionally damaging and short sighted.</p> <p>For Backwell. A massive road, destruction of wildlife, noise, light pollution, a multistory carpark. Really?! Come come now, is that right that people who have been living in a peaceful village now have to live in a transport hub?! To think people will sit back and give you a big thumbs up whilst you violate them is frankly laughable.</p> <p>It would seem that Backwell would be paying an extremely high price. Taking on a lot of heavy lifting in terms of traffic and building. It basically means that we won't exist anymore. It's TOTALLY disproportionate. Below is a very short list of the issues.</p> <ul style="list-style-type: none"> • 700 Houses on Grove Farm doubling our population • Car Park Expansion at Nailsea & Backwell Train Station • Park & Ride for Trains and Metrobus • Backwell becoming a “Transport Hub” serving a much wider area • A Link Road and Metro Bus (lite) Road linking the Nailsea SW development to Backwell and eventually going on to the M5 at Clevedon • Road running next to Backwell Lake and out onto Station Road. Bringing traffic in from the Motorway and surrounding areas • A New access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell. • New access roads at Rodney Road and Moor Lane on to Grove Farm • New roads linking Nailsea. (depending on where Nailsea’s 3,200 new houses are allocated). • Noise • Light pollution • Stress and extinction of some of our local wildlife including bats, Kingfishers, Otters etc <p>Rebecca Danson Backwell resident.</p>	
R Forbes		<p>In response to the above document consultation, my comments are:</p> <ol style="list-style-type: none"> 1. The Joint Spatial Plan (JSP) is still in a consultation phase. It is far too premature for NSC to propose how the draft JSP could be implemented in North Somerset. 2. The JSP/LP proposals for a Strategic Development Location of 700 houses at Grove Farm. An increase of 40% in the size of Backwell would completely change the character of the village and result in a messy suburban sprawl with no proper identity. 3. The proposal for a new school near Grove Farm is not supported by any evidence from a coherent strategic plan for Backwell’s schools in the enlarged village. 4. The JSP & LP propose a new road across Backwell Common (Green Belt), why is this justifiable? Particularly over a lake with significant wildlife habitation? 5. They also propose the creation of a ‘Transport Hub’ at the train station, a station that is already inadequate, the trains are packed at peak travel times. 6. They further propose improvements at Backwell cross roads, how can this be possible with the dense population on the site? There are already daily tailbacks and significant issues when the M5 is closed or busy. 7. The A370 already has significant flooding issues which would be further exacerbated by additional building. 8. The proposals for a large-scale development at Grove Farm and a much larger one at Nailsea and elsewhere, will significantly increase the volumes of traffic through Backwell despite new roads being planned. The pressure on Backwell’s current roads will increase with the extra households. How is this economically or environmentally viable? Why is a more future proof transport system not being considered. There is very little employment in the area, most households will have at least 2 commuters, likely travelling by car. The pollution and congestion will be excessive. 9. There is a total lack of clarity on how these expensive infrastructure changes would be funded, especially as they would be needed before the housing development. What guarantees would be given that the infrastructure would be in place before any building commences? 10. So far there has been no proper consideration of The Vale (near the South Bristol Link Road) as a suitable location for a large-scale development. This site is much closer to far more employment opportunities and would thus minimise commuting traffic. A comprehensive review is required. 	

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RachD		<p>The fact that you (NSC) are spending a lot of money on this local plan before the JSP has even been considered this matter is DEEPLY troubling. Is it that you don't care what anyone thinks? Is there an agenda we should know about? Is it that you are that arrogant that you think it's a done deal regardless? It's very hard to trust an organisation where skulduggery seems to be so open.</p> <p>It's so unfair that NSC are putting residents under unnecessary stress before the JSP. It's not healthy to have this issue hanging over us.</p> <p>For Backwell. A massive road, destruction of wildlife, noise, light pollution, a multistorey carpark. Really?! Come come now, is that right that people who have been living in a peaceful village now have to live in a transport hub?! To think people will sit back and give you a big thumbs up whilst you violate them is frankly laughable.</p> <p>It would seem that Backwell would be paying an extremely high price. Taking on a lot of heavy lifting in terms of traffic and building. It basically means that we won't exist anymore. It's TOTALLY disproportionate. Below is a very short list of the issues.</p> <ul style="list-style-type: none"> • 700 Houses on Grove Farm doubling our population • Car Park Expansion at Nailsea & Backwell Train Station • Park & Ride for Trains and Metrobus • Backwell becoming a "Transport Hub" serving a much wider area • A Link Road and Metro Bus (lite) Road linking the Nailsea SW development to Backwell and eventually going on to the M5 at Clevedon • Road running next to Backwell Lake and out onto Station Road. Bringing traffic in from the Motorway and surrounding areas • A New access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell. • New access roads at Rodney Road and Moor Lane on to Grove Farm • New roads linking Nailsea. (depending on where Nailsea's 3,200 new houses are allocated). • Noise • Light pollution • Stress and extinction of some of our local wildlife including bats, Kingfishers, Otters etc <p>I could go on, but I know that you know all this. You just don't care</p>	
Rachel Bannister		<p>My husband and I completely understand the need for new houses to be built around the country. However, a village like Backwell cannot take 700 new houses. The traffic can be hideous as it is. The proposals for the new local access roads seem to be very poorly thought through, with little or no consideration for a) existing local residents and b) the fact that most new homes are occupied by 2-car families, so a crazy increase in traffic.</p> <p>On the issue of the drastic bypass proposals, it really feels like the village of Backwell would be paying an extremely high and disproportionate price, not least because of the issues of the destruction of environment, wildlife habitats, creation of noise (and other) pollution, etc. As a Council, are you actually comfortable for one of your areas to lose its village feel and be obliterated in the name of 'progress'?</p> <p>It all smacks of desperation. Why on earth aren't you pushing for development on the edge of Bristol where infrastructure already exists?</p>	
Rammy66		<p>The fact that you (NSC) are spending a lot of money on this local plan before the JSP has even been considered this matter is DEEPLY troubling. Is it that you don't care what anyone thinks? Is there an agenda we should know about? Is it that you are that arrogant that you think it's a done deal regardless? It's very hard to trust an organisation where skulduggery seems to be so open.</p> <p>It's so unfair that NSC are putting residents under unnecessary stress before the JSP. It's not healthy to have this issue hanging over us.</p>	

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		<p>For Backwell. A massive road, destruction of wildlife, noise, light pollution, a multistory carpark. Really?! Come come now, is that right that people who have been living in a peaceful village now have to live in a transport hub?! To think people will sit back and give you a big thumbs up whilst you violate them is frankly laughable.</p> <p>It would seem that Backwell would be paying an extremely high price. Taking on a lot of heavy lifting in terms of traffic and building. It basically means that we won't exist anymore. It's TOTALLY disproportionate. Below is a very short list of the issues.</p> <ul style="list-style-type: none"> • 700 Houses on Grove Farm doubling our population • Car Park Expansion at Nailsea & Backwell Train Station • Park & Ride for Trains and Metrobus • Backwell becoming a "Transport Hub" serving a much wider area • A Link Road and Metro Bus (lite) Road linking the Nailsea SW development to Backwell and eventually going on to the M5 at Clevedon • Road running next to Backwell Lake and out onto Station Road. Bringing traffic in from the Motorway and surrounding areas • A New access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell. • New access roads at Rodney Road and Moor Lane on to Grove Farm • New roads linking Nailsea. (depending on where Nailsea's 3,200 new houses are allocated). • Noise • Light pollution • Stress and extinction of some of our local wildlife including bats, Kingfishers, Otters etc <p>I could go on, but I know that you know all this. You just don't care.</p> <p>Paul Ramos Backwell resident.</p>	
Rcam		<p>I wish to object to the Local Plan (specifically regarding the proposed additional 700 homes in Backwell) on the following basis</p> <ul style="list-style-type: none"> • Backwell's streets and roads are already inadequate for the current volume of traffic currently using them. Station Rd barely copes. Recent traffic calming measures in Station Rd have improved the speed and noise but a further (potentially) 1000 vehicles would render it impassable. The A370 is severely congested during peak hour in both morning and afternoon. Moor Lane is almost as bad and is basically a single lane due to existing residents parking on roadside. • There is no proposal for any increase in services; I believe that schools and doctors etc would not cope with the increase in population • There is no/minimal employment in Backwell or Nailsea so new residents would generally commute to Bristol any way - why isn't this development proposed for Ashton Vale where Green Belt has already been compromised by the south Bristol Link and where there is employment within walking distance and adequate space to build new schools etc. • The proposed development will impact on the foraging zone of the bat colony in Brockley which I believe is a very important maternal roost. this development will directly result in destruction of a significant amount of habitat because of loss of hedgerows and fields <p>I am not a 'Nimby' but simply feel this has not been thought through properly</p>	
Ribbon		<ul style="list-style-type: none"> • The JSP/LP proposals for a Strategic Development Location of 700 houses at Grove Farm (an increase of approx 40% in the size of Backwell) would completely change the character of the village and result in a messy suburban sprawl with no proper identity. We would in effect join up with Nailsea. • The proposal for a new school near Grove Farm is not supported by any evidence from a coherent strategic plan for Backwell's schools in the enlarged village. • The proposals for a large scale development at Grove Farm and a much larger one at Nailsea and elsewhere, will significantly increase the volumes of traffic through Backwell despite new roads being planned. The pressure on Backwell's current roads will increase hugely with the extra households. After all, 700 houses with an 	

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		<p>average of 2 cars per household is 1400 extra cars without even looking at the extra 1000s of cars caused by the 1000s of houses planned for Nailsea. The JSP & LP propose a new road across Backwell Common (Green Belt and swampy), creation of a 'Transport Hub' at the train station and 'improvements' at Backwell cross roads(!).</p> <ul style="list-style-type: none"> • There is a total lack of clarity on how these expensive infrastructure changes would be funded, especially as they would be needed before the housing development. • A comprehensive Green Belt Review is required. So far there has been no proper consideration of The Vale (near the South Bristol Link Road) as a suitable location for a large scale development. This site is much closer to far more employment and would thus minimise commuting traffic and be much more sustainable. 	
Roger Key		<p>1. Strategic Development Locations</p> <ol style="list-style-type: none"> 1. The I&OD includes four areas for development that are described as Strategic Development Locations (SDLs). Given the forecast population growth in the WoE and in North Somerset, I am not against the proposals for some large development sites, as they can deliver the required infrastructure in terms of local amenities. However, I do object to the proposed sites at Nailsea and Churchill/Mendip Spring. 2. Of the SDLs included in the I&OD, I can see that Banwell and Backwell may have their merits. Banwell is close enough to Weston-super-Mare for new residents to travel to work in Weston by cycling or new public transport services. Meanwhile, Banwell village has long needed a bypass and construction of new houses will contribute to the cost of its construction. (I am not convinced that the additional houses should be located north of the proposed bypass but that matter is for a later stage of plan making. Backwell is well served for non-car travel by train and by regular bus services along the A370. So I can see the case for modest growth of Backwell too. 3. In contrast, I am completely opposed to the proposed SDL of 2675 dwellings with employment land at Churchill/Mendip Spring because the site is simply too isolated and too far from the employment centres of both Bristol and Weston-super-Mare. There is little prospect of providing a frequent bus service to attract travellers away from their cars to these destinations. So residents working in those locations will be forced to travel by car adding to traffic on the routes to the west and north, including both the A370 and the A38. The A38 to the north of Bristol Airport already needs improvement (even before the airport applies to expand its passenger limits). The A370, with several villages straddling the road between Congresbury and Flax Bourton, is not capable of carrying significant growth in traffic without harming those settlements through declining air quality, noise, vibration, severance and an increased risk of accidents. 4. I also have concerns about the allocation of an SDL for 2575 dwellings with employment land, within the Plan period, located to the south-west of Nailsea. Here, I can see that there may be scope for some development but the location appears to me to be on the "wrong side" of Nailsea, as it's too remote from the town centre. It seems to me that it would be better to concentrate development at Nailsea on the north and north-east side, where it would be closer to and easier to integrate with the existing town. Extensive development to the south-west would also concentrate development traffic on the A370. Even with the suggested transport mitigation package, the JSP Transport Topic Paper (Update) WED007 predicts increases of traffic of several hundred vehicles in the AM peak, which is probably beyond the capacity of the existing road. Allocating land to the north and north-east would channel additional traffic onto the B3130, where it would impact on far fewer residents. 	
RRobins		<p>I am strongly opposed to this Local Plan, The plans for Backwell are inappropriate. Backwell already has a Neighbourhood Plan in place to support a sustainable increase in housing. The proposed huge increase in housing and development of Backwell as a Transport Hub are inappropriate for a village of this size and would have a very detrimental effect on the environment and character of the village. Which very sadly if this was allowed to happen would no longer be a village.</p>	
S & D Morris		<p>Regarding the proposal of 700 new houses in Backwell on The Grove Farm site we are writing with the following comments -</p> <ol style="list-style-type: none"> 1) The character of Backwell, as a village, would be lost if 700 houses are built on the site. 	

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		<p>2) Already the roads around the village are struggling to cope with the present volume of traffic which includes residents from Nailsea and if plans which are already in the pipeline for large housing developments it will exacerbate the situation even worse than it is now. The infrastructure is inadequate for any further developments in the area especially on the A370 which is the main route that people use between Backwell and Nailsea to Bristol and therefore the roads would have to be done first.</p> <p>3) The Vale site near to the South Bristol Link road would be ideal for large housing developments because it has the road infrastructure for cars and the metro bus to travel to and from Bristol. If people used the metro bus then that would reduce the number of cars going to the city.</p> <p>We trust the these points will be taken into consideration for the next meeting.</p>	
S Hopkinson-Parker		<p>In my opinion, it is outrageous that North Somerset Council (NSC) should be spending time and money considering this Local Plan in advance of the JSP inspection in 2019.</p> <p>The proposal to vastly increase the size of Backwell is completely unsustainable. Backwell will no longer be a village but will become a 'Transport Hub' serving the M5 at J19/20. This will generate more traffic, more pollution and 700 new houses, all vying for position on the already congested A370.</p> <p>NSC are happy to propose "tinkering" with the Green Belt in villages like Backwell, but yet refuse to consider ALL options within their control. They are prepared to consider the catastrophe of a new Link Road next to Backwell Lake, linking traffic (including Metro Bus) to Clevedon and the Motorway. Another Link Road (including Metro Bus) crossing unstable moorland, greenbelt and agricultural land on to one of the most ancient parts of Backwell at Backwell Common. A road crossing over or under the railway line and emerging next to Flax Bourton & Backwell Cricket Club, opposite Stancombe Quarry, which already has hundreds of lorries emerging every day. Expanding the Car Park at Nailsea & Backwell Train Station with a Multi Level Car Park, in effect turning the Train Station and our Village in to a "Park and Ride". The Local Plan talks about supporting and enhancing the Village Centre and addressing traffic issues on the A370, yet there is no substance or costings for any of this, indeed building more roads and more houses, will only add to the problem, and how does any of this enhance the Centre of our Village?.</p> <p>NSC seem to think that the Village of Backwell has sufficient employment and services, such as Doctors and Dentist etc to support thousands of extra people, yet the reality we know will be that the vast majority will commute in to Bristol, (particularly if the linked transport document which suggests closing Station Road under the Railway bridge is implemented!), and what of local services?. Backwell is a village with a Neighbourhood plan, which has looked carefully at sustainable growth, which is in proportion to the Village, 100 new houses all given planning, all planned, all costed, all sustainable, all proportionate to the size of Backwell. That, NSC is a PLAN! Your Local Plan or "Issues and Options" document does indeed have a number of "Issues", which I object to in the strongest possible terms.</p> <p>Summary It is outrageous that NSC should be spending time and money considering this Local Plan in advance of the JSP even being looked at and inspected next year. The proposals to increase the size of Backwell by almost double in one foul swoop and create a "Transport Hub" with Multi Level Car Park, link roads to the M5 and a Metro Bus "Park & Ride" are unsustainable and reckless.</p> <p>These proposals would decimate Backwell as a Village and destroy our community and wildlife.</p>	
S Stephen		<p>I'm strongly against the proposed Joint Spatial Plan (JSP).</p> <p>The JSP will damage the character of the village of Backwell, increasing its size by nearly half.</p> <p>It will damage green belt land and take up valuable farming land.</p> <p>The increased congestion, with the associated noise and pollution, on the surrounding roads would be intolerable. Long commutes into Bristol would become far worse, and the junction of the A370 with Station Road could be gridlocked.</p>	

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		<p>The infrastructure is simply not there to support all the new residents that would come with 700 homes. This would disadvantage new and present residents alike.</p> <p>There are other alternatives, and these should be pursued.</p> <p>The proposed 'mitigation measures' are wholly inadequate and do nothing to address the underlying issues. For example blocking Station Road is ridiculous. This would in effect cut Backwell off from Nailsea, with the important infrastructure that is present in Nailsea, and would not 'fix' anything.</p> <p>The Joint Spatial Plan should be rejected.</p>	
S Summers		<p>I'm writing to object to the significant number of houses proposed to be built in Backwell. Whilst I agree there needs to be an increase in housing especially for those who need affordable housing this does not meet the needs and changes significantly a village into an unthought out town with poor infrastructure and no amenities. The A370 is already at capacity and all of these houses will have cars that will join this.</p>	
S. Harper	Mr.	<p>I think it is too early to be discussing the draft JSP whilst it is still in consultation phase.</p> <p>That aside... The proposal of an additional 700 houses at Grove Farm is far too large for a village the size of Backwell. An increase of 40% in the number of dwellings would change the identity of the village for the worse.</p> <p>It is unsustainable.</p> <p>The proposed road changes would cut straight across the Common - which is green belt. Will they actually get built? The link to the M5 - likewise. How will this infrastructure be paid for? Why pay for massive infrastructure changes like this when there is a far more suitable site - The Vale.</p> <p>Creating a Transport Hub at the train station... This would cause major disruption on a daily basis on the roads around Backwell and Nailsea adversely affecting the villagers - hardly enhancing the village. This hub would not be needed if The Vale was looked at again and gets approval.</p> <p>What I don't understand is why NSC are so reluctant to review the Green Belt plan. I agree that there is a requirement to build new homes. But why build them miles from the centre of most employment opportunities, Bristol? It would be a much better idea to build them closer to Bristol at The Vale.</p>	
SCT1967		<p>I am completely opposed to the strategic locations for housing on this scale in Churchill, Banwell and Backwell. There are no significant new employment opportunities in these areas so as a consequence additional housing will hugely increase the number of commuters travelling from North Somerset to Bristol, and there is no plan to upgrade existing transport infrastructure to carry this commuter traffic from North Somerset to Bristol. Current road travel times into Bristol at rush hour are up to 90 mins from Churchill to Bristol along the A38, and similar from Congresbury to Bristol along the A370. Train infrastructure is already at breaking point with insufficient provision for the number of commuter travellers, as well as there already being insufficient parking at the two main railway stations at Yatton and Nailsea/Backwell to accommodate commuters from outlying villages. North Somerset Council should be building on Ashton Vale and areas closer to Bristol which could be served with existing infrastructure.</p>	
Sheena Court		<p>I am totally opposed to the plans for Backwell and Nailsea. Houses should be built near to the jobs in Bristol. Transport infrastructure is environmentally damaging and the cost of creating roads and infrastructure is disproportionate to the benefit of 700 more houses in Backwell. A development of 700 houses in Backwell will totally destroy the village and surrounding area. The proposed transport link will turn the village into a commuter town and only create congestion and pollution as more and more cars join the</p>	

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		commute to Bristol. In addition, the area cannot accommodate the 2,500 additional houses in Nailsea. The roads are already congested and you cannot find a parking space at the shopping areas in Nailsea and Backwell.	
Simon Hegarty		I have the same objections to this as to the Mendip Spring Garden Village. It is fundamentally flawed and will be found to be unsound at the JSP examination.	
SRH		I would like to strongly object to the NSC Local Plan on the grounds that it will completely change the character of a small local village to a major regional transport hub, but without the necessary consideration of the impact on the local area. The joint spatial plan is in fact still in consultation phase and so it is really too premature for NSC to be taking a view on its implementation. The additional plan for a new school does not seem to be supported by evidence from a strategic plan for local schools. Perhaps most concerning is the impact on local traffic. The A370 is already an extremely busy road and with the introduction of the new link road, at its entry in to Bristol there is now major congestion every day. The increase of 700 new households will dramatically and detrimentally affect traffic congestion, both locally (the Backwell crossroads is well known to be a traffic black spot) and more widely in the area and route into Bristol. There are so far no proposals as to how any additional infrastructure might be funded, creating a great risk in pressing ahead with new developments before this matter is resolved. Finally I would like to note that there does not seem to have been proper consideration of alternative sites, such as the Vale near the new link road, which already has good transport links.	
suchynam		<p>Thank you for the reminder of the deadline looming for the consultation on the Local Plan Issues under North Somerset Councils "NSC" JSP.</p> <p>There is nothing in any new consultations giving me confidence NSC are listening to local people in Backwell and surrounding areas. The proposed development will only turn Backwell into a massive car park and transport hub for people needing to commute to Bristol or Weston for their work commitments and only those people will benefit from any such proposal and at what expense?</p> <p>No one at NSC appear to be listening to local feeling, this plan is unpopular with the majority of residents and despite many comments made a year ago NSC are still ploughing ahead.</p> <p>I can only reiterate some of the main points I have previously made so in summary and in no order of importance please see below:-</p> <ol style="list-style-type: none"> 1. The 700 houses planned to be built on Grove Farm will increase a small respected and cherished village by 40%. It does NOT reflect the agreed expansion under the Neighbourhood Plan (which was given a seal of approval by the Government) and will destroy the village feel. 2. The loss of arable agricultural land will only result in the destruction of valuable food producing services. Land which supports many species of endangered wildlife including the Greater Horseshoe Bat which has a well established colony at Brockley Hall Stables. The JSP proposal for mitigating this issue does NOT comply with relevant habitat regulations! 3. To reduce additional traffic congestion that would be created by such a development would require massive new infrastructure i.e. roads, drainage, bridges across flood plains, plus expanding GP surgeries and schools – the JSP does NOT explain how this would be achieved, I can see no plans for flood prevention, damage to greenbelt and destruction of nature conservation especially around Backwell lake and surrounding villages of Brockley and Chelvey. 4. Where are the long term job prospects in this area? <p>I am therefore interested in knowing the answers to the above and also the points below-</p> <ol style="list-style-type: none"> 1. Why are NSC jumping the gun before this plan has been reviewed by Government Inspectors? 2. Who will be responsible for monitoring the Governments dictate ensuring any house building company will comply with the 35% affordable housing requirements, should the green light be given? We cannot trust or rely on any house building company to honour this? they are only interested in financial gains for their shareholders and big bonuses for their Board and CEO – look at Jeff Fairbanks of Persimmon who ironically made his big fat bonus on the back of the Governments Help to Buy Scheme, a crime in itself! 	

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		<p>3. Why won't NSC reconsider the Vale – yes it's greenbelt BUT has already been compromised by a £220m+ spend on a new metro bus route via the new South Bristol link road. This is where the main employment is and seems crazy to build so far away from this point with no one bothering to explain how this massive expense would be funded?</p> <p>I along with many residents understand there is a need to build additional housing but these must be built in the right location so please therefore ensure my concerns are documented and my concerns taken into consideration.</p>	
T Potter		<p>I write regarding the above proposals relating to Grove Farm & 700 proposed dwellings. The proposed development will be adjacent to my property. I have studied the proposals and would set out my comments below</p> <ol style="list-style-type: none"> 1. The Joint Spatial Plan (JSP) is still not finalised. It is far too early for NSC to propose how the draft JSP could be implemented in North Somerset. 2. The JSP/LP proposals for a Strategic Development Location of 700 houses at Grove Farm will increase the village by some 40% and would completely change the character of the village and spoil it. 3. The proposal for a new school near Grove Farm is not supported by any evidence from a coherent strategic plan for Backwell's schools in the enlarged village. 4. The JSP & LP propose a new road across Backwell Common (Green Belt), creation of a 'Transport Hub' at the train station and 'improvements' at Backwell cross roads(!). The proposals for a large scale development at Grove Farm and a much larger one at Nailsea and elsewhere, will significantly increase the volumes of traffic through Backwell despite new roads being planned. The pressure on Backwell's current roads will increase with the extra households. 5. There is a total lack of clarity on how these expensive infrastructure changes would be funded, especially as they would be needed before the housing development. 6. So far there has been no proper consideration of The Vale (near the South Bristol Link Road) as a suitable location for a large scale development. This site is much closer to far more employment and would thus minimise commuting traffic. A comprehensive Green Belt Review is required. 	
T-coy		<p>I object strongly to the proposed new road that will destroy a large part of Backwell Common. This area is one of the major appealing features of Backwell and is well used for walking cycling and other leisure pursuits. Building a road through it would adversely affect the area forever. Furthermore, I am concerned that the green belt land around Ashton Vale seems to be respected by development plans yet Backwell Common is not.</p>	
The Belmont Estate	Ridge and Partner LLP	<p>As highlighted earlier in this letter, we note that Historic England has raised concerns in relation to development at Backwell in response to the consultation on the JSP earlier this year. Within that response, it is highlighted that further work will be required at this Plan making Stage to clarify the route, form and scale of the proposal to help appreciate the impact on the historic landscape and the setting of Heritage Assets likely to be affected. We fully support these views.</p> <p>Historic England also specifically notes the proximity at the Eastern end of a potential road to the Tyntesfield Estate (National Trust). We would also like to take this opportunity to emphasise the potential impact on significant Heritage Assets of a new M5 Junction to serve a new road from Nailsea. We therefore suggest that if the road network has to be modified, the Vision for Backwell needs to be amended to state:</p> <p><i>Backwell will remain an attractive and vibrant village set on the edge of the Green Belt. A modified road network will facilitate expansion of the village and relieve pressure on Backwell Crossroads and Station Road and allow environmental improvements within the village. There will be improved access to the rail station and opportunities for walking and cycling as a matter of priority. The new development and associated infrastructure will respect and enhance the setting of heritage assets including the setting of nearby Chelvey, Tyntesfield and Belmont Estates.</i></p>	
Tim Harland		<p>The NSC local plan has failed to take into account views held by local residents on their own Neighbourhood plan but seems to have adopted the working proposals by the JSP.</p>	

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		<p>This consultation is premature and inappropriate given that the JSP Independent Inspection has not taken place. The scale of the proposed developments at Backwell are completely inappropriate given the current size of the village and existing infrastructure.</p> <p>Therefore I must object in all respects about the proposal for a village extension that in truth increases the size of Backwell by over 40% and will be of detrimental effect change the nature of the community forever.</p> <p>Housing & unaffordable infrastructure on a flood plain which is greenbelt and rich agricultural land is impractical. The transport plans would exacerbate the traffic issues and are undeliverable and unsustainable.</p> <p>I'm saddened that in addition to adopting unrealistic housing need projections that NSC hands over land and assets to the JSP without seemingly any creative alternatives.</p>	
Tink		<p>I have been confused to read of this new Local Plan when a very sound and indeed accepted Local Plan for Backwell already exists. Infact so successful that it is already being acted upon in the village with the building of 100 new houses that are considered proportionate. And a Local Plan that has been identified as a shining example to other communities.</p> <p>I also find it very concerning and confusing to see that you are carrying on as if nothing at all had been said in objection to the JSP when it has now been referred to the Inspector.</p> <p>The JSP and Local Plan simply do not make sense. And as a voter and tax payer I am concerned at the general lack of sense being applied. When both developers and residents alike all support The Vale as a fantastic opportunity to develop the outskirts of Bristol in a proportionate and responsible way where infrastructure already exists and therefore costs and disruption are also therefore proportionate. The amount of infrastructure required for a new transport hub on top of the 700 houses in Backwell is disproportionate, unsustainable destroying the nature of Village life, community and wildlife. Backwell is not Bristol and nor should it be.</p>	
Wrington Parish Council	Wrington Parish Council	It is difficult to accept the vision without more definitive information.	
wwarden		<p>In this case I think it would be best to leave any detailed comment to the residents, business and others with a more direct interest. However, I must say that I find the suggestion of any new road construction through the green space which currently separates Nailsea from Backwell as bizarre. Any new development or other works which might impact on the lake here should not be given further consideration. It would be irresponsible to progress this further.</p> <p>I note the point made in both cases about ecological sensitivity and Greater and Lesser Horseshoe bats. This should be given more priority. It's unfortunate that potential ecological impacts are ignored. There is a reference to Horseshoe bats in relation to the suggested 'garden villages' and other development, yet these vulnerable and protected animals would be at risk from the proposed development, including around the airport site. Bats don't appreciate new built development, new roads and lighting.</p>	

Document Part Name

Q20. Do you agree with the principles set out for Backwell and would you suggest any changes to these?

Respondent Name	Respondent Organisation	Comment	Attached documents
A Sutherland		I strongly disagreed with the principles set out for Backwell. I would suggest that other options such as the Vale are considered due to the more appropriate existing infrastructure .	
Anita Golding		<p>I understand North Somerset needs to build new houses, but to consider this plan before the JSP has been looked at seems premature.</p> <p>To double the size of Backwell by building a huge estate at Grove Farm does not seem the most sensible way of increasing the housing stock in the county. Backwell will no longer be a village but a Transport Hub.</p> <p>Building a metro bus link/2 storey car park/M5 link road would be detrimental to the wildlife on the green belt between Backwell and Nailsea, Backwell Lake is a haven for birdlife and small mammals, their habitat would be seriously damaged. It is also not conducive to village life to have a multi storey car park, is the existing Backwell village to be turned into a Park and Ride?</p> <p>If you build new schools in the Grove Farm development these schools could well end up with not enough pupils in a few years once all the young children have grown up - just like what has happened in Nailsea. New shops on a housing estate will not help keep the shops in Nailsea and Backwell open.</p> <p>Why not look at building on brownfield sites, improving the existing rail link to Bristol (subsidised transport for youngsters, more carriages on the trains in the rush hour), better cycle lanes/more cycle parking and trying to get housing built where it will have a lower impact on a whole community. Also how about looking at the health of North Somerset residents, why concentrate on the car, what about walking/public transport.</p> <p>Please consider your small villages in North Somerset an asset not a Strategic Hub that can be ruined at a planner's whim.</p>	
Avon Wildlife Trust	Avon Wildlife Trust	<p>The transport scheme required to support the development in Backwell is primarily based on building new roads in very ecologically sensitive areas. The land take required for these new road has to potential to destroy ecological rich habitat in the North Somerset Levels and Moors which provides 3% of the remaining wetland habitat in the UK. These new roads also have the potential to cause significant severance of greater and lesser horseshoe bat commuting routes. These routes are particularly sensitive in this location due to their proximity to major summer maternity roosts which are designated as Special Areas of Conservation.</p> <p>All development proposed in the Local Plan must be compliant with North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document.</p> <p>Many of the waterbodies in North Somerset are failing to achieve the environmental targets set for them in the Water Framework Directive. It is vital that any new development does not have an adverse impact on the surrounding waterbodies WFD status.</p>	
BJ Allsop		<p>I do not think alternatives have been sufficiently explored. I do not agree with the principles set out for Backwell and would like the statements A and B to be considered.</p> <p>A. I note that all the proposed solutions to the Backwell situation as well as that of the villages along the A370 and even along the A38 (due to the new Bristol South Link) depend on crossing the River Avon at the Cumberland Basin. Even the proposed new road traffic routes merely move traffic congestion away from such current choke points as the Station Road/A38 traffic lights to the A370 closer to Bristol and will result in major traffic chaos from the Cumberland Basin back down the A370 (and A38) towards Backwell (or towards WSM in the worst case). There is basically no solution to this traffic congestion without a major re-routing of traffic within Bristol so as to reduce the traffic load on the Cumberland Basin. The tinkering with the "Transport Hub" to enable cyclists and pedestrians easier access to the station will not materially change the traffic congestion problem. In fact due to the railway line having to accommodate express trains, the options for laying on further trains to accommodate the new builds is less than it may appear at first. Finally the Metrobus is looked upon as the universal solution to Bristol traffic problems but is completely unproven especially for lengthy trips such as Backwell to Bristol. It might require an awful lot of Metrobuses.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>I have lived in the Los Angeles area for many years and the development of huge flyovers and high speed roads could solve this problem by enabling the heavy traffic coming in over the Cumberland Basin to "fan out" to the various areas of Bristol. However the cost would be huge and Bristol would be forever changed. It would probably need a high level motorway bridge over the Avon Gorge.</p> <p>B. There is a requirement to build new roads in the Backwell Common Green Belt which would essentially destroy this wonderful ribbon of peace and tranquility between Backwell and Nailsea. The peaceful tranquility with grazing cattle and babbling brooks which is one of the major rewards of living in the Backwell/Nailsea area would be lost for ever. More than 15,000 people live within ten miles of this Green Belt and enjoy this amenity. What is especially perplexing is why the North Somerset Council would not survey the possibility of moving much of the proposed development to The Vale, apparently on the grounds that it is also Green Belt. My suggestion is that a review of the relative viability of the Backwell Common Green Belt vs the Vale Green Belt be undertaken. On the face of it The Vale Green Belt is much more suited for large scale development as it would reduce the distances needed to be travelled to access Bristol by 90% with corresponding reductions in pollution and fuel use. Many much cheaper routes could be constructed with many small crossings of the Avon and cause the traffic to fan out over Bristol and the use of Metrobus would be much more effective due to the shorter distances as would pedestrian and cycle traffic. What makes one Green Belt subject to destruction while keeping another neighbouring one which is not enjoyed by as large a population? Surely it is reasonable to review this situation.</p>	
Blagdon PC	Blagdon Parish Council	We support the principles but remain concerned about the authority's ability to deliver these.	
Bridget Petty		<p>The issues on Station Road and the A370 cannot easily be remedied. Aim for more inspiring and innovative solutions to Surface water .</p> <p>The principles doesn't refer to the housing density but I would hope the scheme was not as large as 700 and affordable housing (shared ownership) was delivered. I continue to have serious concern about this size of scheme on the side of Backwell.</p>	
C Margetson		<p>I am writing to object to the proposed 700 houses for Backwell, almost doubling it in size and turning our village into a so called 'transport hub'.</p> <p>Your ongoing disregard for the village is a testament to your apathy for anyone else's opinion. Recent planning inspectors' reports on much smaller developments have concluded they were too big for the size and character of the village – how does the council believe that 700 houses on green farmland is a suitable proposal? And how is it fine to keep proposing roads (which don't appear to have any budget) across greenbelt but impossible to consider building houses at the Vale where a road already exists – and where it would be easy to extend public transport into Bristol by comparison.</p> <p>Good to see that someone has now included Backwell Lake which had been completely overlooked previously. Admittedly, the idea of running the road through it on stilts appears to have been discarded but to suggest that you are safeguarding the wildlife by running a road alongside it instead, is ridiculous.</p> <p>The current local plan recognises that previous feedback was extremely critical. One of your proposed mitigations is to use historic field names within the new development – is this a joke? You cannot propose to land 700 houses on a small village and announce that it's ok because we're going to have roads named after fields which no longer exist.</p> <p>You are also proposing that one primary school will meet all the needs of the extra 2,100 people that 700 houses will add to the village (based on a minimum of 3 people occupying each home). I'm not sure what's supposed to happen when these kids age beyond 11, or when someone needs a doctor or wants to be able to park in the village to use one of the services but it doesn't appear that this is factored in anywhere. The current long traffic queues into Bristol will worsen – yes there'll be a rat run across the fields to join the A380 higher up but then the queues will just be worse from there on in. And if people use the train, good luck getting on as it can be hard to find space to stand at the moment due to the overcrowding.</p> <p>Stop trying to build on green farmland, stop proposing roads which will damage the area and have no budget anyway and stop trying to turn our village into a transport hub. And stop spending time and money on this – the council is endlessly claiming they are short of resources so quit wasting them.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
C Melton		<p>I am writing to strongly object to the North Somerset Local Plan, Joint Spatial Plan and the proposed 700 houses on Grove Farm in Backwell and the 4 Lane Link Road/Metro Bus route proposed to support this housing.</p> <p>The proposed 700 houses would result in a 40% increase in the population of Backwell, which, together with other applications, could rise to 50%. Backwell is a small village and does not have the infrastructure, facilities or employment to support this increase, therefore the proposal is not sound. This increase would also completely change the character of Backwell as a village, notwithstanding the additional traffic feeding through to an already congested A370 and the impact on wildlife.</p> <p>The plan is not justified as it has not been tested against all reasonable alternatives. NSC is the only Council in the West of England which has not committed to a Greenbelt Review, but appear to be happy to support a Link Road through untouched greenbelt in Backwell. The Plan is not consistent with national planning policy as it fails to recognise the need to review the Green Belt to provide long term growth in a sustainable manner.</p> <p>It is not effective because it is not deliverable by 2036. The 4 lane link road and metro bus route has not been costed and no funding has been identified. There is no assessment of how the road/metro bus route would be built across unstable moor land, prone to flooding. Also, my understanding is that the road would still link onto the A370 which is already congested so it would only increase traffic problems not solve them. The build rate for the 700 houses is also achievable based on NSC previous build rates.</p> <p>It is not positively prepared to meet the housing needs of North Somerset in a sustainable manner and would have a devastating impact on protected landscapes, habitats and our community.</p> <p>Backwell Lake is a beautiful spot in our village. We saw our first ever kingfisher there and have also seen otters, it seems unlikely such wildlife would continue to visit the lake if the proposals went ahead.</p> <p>We love living in Backwell and bought our home here as we wanted to bring our children up in a friendly village near to countryside. These proposals would change Backwell irretrievably and not for the better. It is not nor should it be made into a 'transport hub', it is a village and importantly a community. I find it laughable that in the document it says "the development would need to be sensitively designed to integrate with the village and be appropriate for its rural setting"! How does building 700 new houses (pretty much doubling the size of the village) on fields meet this aim?</p> <p>Backwell should not be ruined for the sake of targets and other motivations that are not in the best interests of the communities involved or those looking to move into those communities.</p>	
Diane		<p>I strongly object to the proposal for a new Station Road – A370 link and the proposed timing of such a link in the first phase. Please see my comments above on the Nailsea and Backwell Transport Schemes.</p> <p>No detail of the proposed modifications to Station Road has been provided and this is needed in order to comment fully. I strongly object to the possibility of closing or restricting Station Road to through traffic. The settlements of Nailsea and Backwell, whilst separate, are interdependent and this is the main arterial route between the two. To close it would isolate Backwell from the services of Nailsea town centre, and risk diverting traffic trying to reach Nailsea from Backwell onto narrow, unsuitable country lanes.</p>	
F Parry		<p>I vigorously oppose the principles set out for Backwell.</p> <ul style="list-style-type: none"> • I do not see how “well-related” development is possible on this scale without ruining the village of Backwell • Retaining historic palettes, styles, hedgerows and field names will count for little when the setting itself has been built over. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • Congestion at Backwell Crossroads is already optimised, and a new access onto the A370 will be massively unpopular if indeed it could every be built (financial and physical impacts could be prohibitive) • I don't agree that a single residential development block is the best way to increase housing, instead smaller spread out housing developments would have much less impact on the social fabric of village 	
Flax Bourton Parish Council	Flax Bourton PC	<ul style="list-style-type: none"> • We consider that establishing the principles is a fundamental step towards developing the detail for development in these areas. • Flax Bourton Council objects to the Strategic Development Locations Proposed in Nailsea and Backwell on the basis of soundness as they are unsustainable, undeliverable and in breach of national planning guidelines, particularly NPPF 11, 35, 102, 103, and 109. • E3 and rephasing of Backwell traffic lights funnels all traffic from the Nailsea and Backwell SDLs currently totalling 2,900 houses in addition to the existing traffic and any additional traffic from the other SDLs through Flax Bourton which is split by the A370 which is the narrowest, slowest section of the A370 with blind bends, pedestrian pavement on only one side and then only single person width, 7 listed buildings fronting the road, concealed driveways, 5 road junctions, access to a children's nursery, primary school, working aggregates quarry and asphalt plant. • The proposed E3 road link will increase traffic causing an unacceptable impact on highway safety see NPPF 109. • The cumulative effect of the E3 and other proposed traffic mitigation works through Flax Bourton will be severe see NPPF 109. • Moving traffic from Backwell traffic lights to Farleigh/Flax Bourton merely moves the problem at huge expense. It will not mitigate or reduce traffic. Existing traffic on the A370 is at capacity and the additional traffic from Nailsea and Backwell SDLs will exceed capacity. Not only will junction capacity be exceeded but also link capacity which will lead to flow breakdown. • For the reasons stated above E3 and other traffic mitigation will have a negative impact on commuting times and economic activity. • We will respond to the Transport Topic Paper 8 WED 007 and Emerging Findings Transport Report WED 008 in detail in the JSP consultation process. We do, however, comment now that these documents are flawed and do not give a plausible or credible basis to the transport proposals in this draft Local Plan. Transport Modelling is unsound, for example, it has failed to take account of the South Bristol Link Road in transferring congestion from Barrow Gurney to the A370. Also Figure 3.6 of Transport Topic Paper 8 (WED007) shows AM peak forecast traffic flow differences without mitigation and predicts surprising results, for example, A370 SW Brockley traffic lights increase of 300-600 PCU (from the SDLs of Banwell & Churchill) but traffic then disappears. Where does it go? Topic Papers show a peak hour increase of 600 vehicles through Flax Bourton. Up to date figures from a NSC assessment in November 2018 show that this represents a 60% increase in peak hour traffic which is unsustainable. • Assessment evidence should be shown that the A370 and the proposed E3 link is the only deliverable option for linking Nailsea and Backwell to Bristol. • We support E6 of the transport scheme as it will improve bus access to Bristol on the Long Ashton bypass which has become increasingly congested since the opening of the South Bristol Link Road. • As stated in reply to Question 3 the absence of Joint Transport Plan 4, BRSWEL Study and any study or report from Railtrack or Train Operating Companies prevents any reasonable discussion for the determination of the locations of SDLs and the transport serving them and therefore whether they are sustainable. This plan is unsound. • No assessment is made of the impact of additional housing on local services - medical, dentistry, schooling, post office etc. An assessment should be made and local planning should take into account the impact on nearby local villages. In the case of Flax Bourton Backwell is the principle service village. 	
H Parry		<p>The proposed development would make Backwell unsustainable as a village – demand on services (doctors, schools etc.), limited employment opportunities and an increase in traffic on the A370 and minor roads of the village, would have a detrimental effect. Backwell has been identified as a 'Highly Sustainable' village following the adoption of the Neighbourhood Plan (2016-2026 and officially approved in 2015), promoting gradual development.</p> <p>This proposal is completely unsustainable and would have a detrimental environmental impact (doubling the size of an existing village, ruinous traffic on already overstretched infrastructure, increased pollution, loss of rare wildlife habitats etc.) not just for Backwell, but for all neighbouring villages, especially those further South of Backwell who already have to deal with long commute time. Development at the scale proposed would change the overall character of the village, effectively stripping it of its rural feel and creating a more urban environment.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>North Somerset Council has not committed to a 'Greenbelt Review' which could identify some alternative, more sustainable sites. One such alternative is 'The Vale' – a greenbelt site just on the periphery of Bristol. This site already has significant infrastructure in place (roads and MetroBus) and supports sustainable transport (walking, cycling) to services and employment opportunities in closer proximity (i.e. Bristol) and would therefore much better support affordable housing requirements. A greenbelt review could result in amending the boundary of the greenbelt so that a site such as 'The Vale' could be fully explored/realised.</p>	
Hallam Land Management Ltd (David Lock Assoc)		<p>HLM support the proposed SDLs at Nailsea and Backwell, which offer opportunities for sustainable patterns of growth on land that is available and unconstrained by Green Belt and AONB. To further support the effectiveness and therefore soundness of these locations it should be anticipated that the Land East of Clevedon will also come forward as a strategic development location, given the cumulative benefits of a Clevedon-Nailsea-Backwell-Bristol corridor aligned with committed infrastructure enhancement which stands to boost interconnectivity between the sites and M5 J20. Indeed the Land East of Clevedon is crucial to unlocking the delivery of a potential J20 link to Nailsea and Backwell. Therefore, the Land East of Clevedon is considered to merit equal consideration with Nailsea and Backwell in terms of formulating a policy over the Local Plan process.</p>	
J Leavett Cook		<p>It is my belief that the proposal for new housing in Backwell is excessive. The village is already based around a very busy road and does not have the infrastructure to support that any new people. It would split the village in two. The current Road system could never cope and the possible Road system would be too disruptive to the village and surrounding countryside. Our countryside should be protected. Rather than building lots more houses in every town and village it makes much more sense to build new towns e.g. Alongside the new link road.</p>	
J Margetson		<p>I totally object to the proposed 700 houses for Backwell. This is not manageable, sustainable or tenable.</p> <p>I was also rather disappointed to wade through a mash of poorly organised and much out of date information which is all over the place. Surely it would have been more logical to have had the pack of information set out on just one PDF document with a contents page! OR was the aim just to bamboozle those who perhaps do not the right IT literacy or appropriate hardware or will to trawl through all the links and links within links?</p> <p>I also note that it is convenient there is another later deadline for JSP for the Technical Evidence Work Consultation. I suspect this is all a ploy to reduce the number of responses and meaningful objections to this. I welcome a response to this just for clarity.</p> <p>Anyway, the statistics quoted are as dubious as they come without really showing where they were actually derived or how they are supported. Worth a check when the supposed projections were made as I guarantee the latest modelling has changed and you will see a very different outcome! I suppose you will always have statistics, damn statistics and lies... Look at the existing infrastructure and new housing in the local area and you can see the demand is simply not there with plenty new homes remaining empty for extended terms or just being resold immediately after without really being lived in. Nationally the housing market is slowing down and North Somerset is not an exception to this. It is particularly hard to understand why the North Somerset Council feel it is right or appropriate to financially prop up national developer plans at the expense of the people of their communities.</p> <p>It is outrageous and premature to say the least, that North Somerset Council should be spending time and money considering this Local Plan in advance of the JSP even being looked at and inspected next year. The proposals to increase the size of Backwell by almost double in one foul swoop are completely unsustainable and reckless. The Local Plan is a wordy document written in council speak which means little to most people. What it will mean if implemented is that Backwell will no longer be a Village but a Transport Hub (as suggested in the Plan), serving the Motorway (M5 at J19/20) and surrounding areas, with more traffic, more pollution and 700 more houses, all vying for position on the already congested A370. North Somerset Council seem happy to propose "Tinkering" with the Green Belt in Villages like Backwell, but yet refuse to consider ALL options within their control. They are prepared to see a Link Road next to Backwell Lake, linking traffic (including Metro Bus) to Clevedon and the Motorway. Another Link Road (including Metro Bus) crossing unstable moorland, greenbelt and agricultural land on to one of the most ancient parts of Backwell at Backwell Common. A road crossing over or under the railway line and emerging next to Flax Bourton & Backwell Cricket Club, opposite Stancombe Quarry, which already has hundreds of lorries emerging every day. Expanding the Car Park at Nailsea & Backwell Train Station with a Multi Level Car Park, in effect turning the Train Station and our Village in to a "Park</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>and Ride". The Local Plan talks about supporting and enhancing the Village Centre and addressing traffic issues on the A370, yet there is no substance or costings for any of this, indeed building more roads and more houses, will only add to the problem, and how does any of this enhance the Centre of our Village?. North Somerset Council seem to think that the Village of Backwell has sufficient employment and services, such as Doctors and Dentist etc to support thousands of extra people, yet the reality we know will be that the vast majority will commute in to Bristol, (particularly if the linked transport document which suggests closing Station Road under the Railway bridge is implemented!), and what of local services?. Backwell is a Village, it has a Village Neighbourhood plan, which has looked carefully at sustainable growth, which is in proportion to the Village, 100 new houses all given planning, all planned, all costed, all sustainable, all proportionate to the size of Backwell. That, North Somerset Council is a PLAN! Your Local Plan or "Issues and Options" document does indeed have a number of "Issues", which I object to in the strongest possible terms.</p>	
June 123		<p>I live in Backwell Common and find your plans take no account if the feelings of the residents of Backwell .</p> <p>To even contemplate destroying the beautiful valley that is Backwell Common goes against everything that is good about living in the countryside . The Common is used daily by the residents of Backwell and Nailsea as a place of leisure whether that be walking, cycling , jogging , dog walking and to destroy that habitat by building a huge road through the valley is a disgraceful disregard of the local residents .</p> <p>The fact that you (NSC) are spending a lot of money on this local plan before the JSP has even been considered this matter is DEEPLY troubling. Is it that you don't care what anyone thinks?</p> <p>It's so unfair that NSC are putting residents under unnecessary stress before the JSP. It's not healthy to have this issue hanging over us.</p> <p>For Backwell. A massive road, destruction of wildlife, noise, light pollution, a multistory carpark and destruction of a well used leisure facility! Come come now, is that right that people who have been living in a peaceful village now have to live in a transport hub</p> <p>I would also like to point out that land itself is very low lying and to build on land with all the problems that come with a high water table with the huge costs involved seems completely mad .</p> <p>I chose to live in Backwell to get away from all the very things you seem to want to bring here . If I wanted a metro bus I would move into a city not live out in the country .</p> <p>You seem to actively want to destroy our beautiful valley and turn us into yet another suburb of Bristol.</p> <p>It seems there is a perfectly good and more practical site in Ashton vale but your council seem not to be prepared to even consider this .</p> <p>Below is a very short list of the issues.</p> <ul style="list-style-type: none"> • 700 Houses on Grove Farm doubling our population. - Putting to many extra cars and people in Backwell . Changing the nature of our village • Car Park Expansion at Nailsea & Backwell Train Station. - You cannot expand the railway tracks therefore the expansion of the station as a transport hub seems ridiculous • Park & Ride for Trains and Metrobus- the ones already in use are proving completely inadequate for their purpose and in totally the wrong routes . • Backwell becoming a "Transport Hub" serving a much wider area - Backwell roads cannot take more traffic and the idea of destroying the valley is abhorrent • A Link Road and Metro Bus (lite) Road linking the Nailsea SW development to Backwell and eventually going on to the M5 at Clevedon - we already have a bottleneck at Ashton Gate . The volume of would be much greater than estimated . • Road running next to Backwell Lake and out onto Station Road. Bringing traffic in from the Motorway and surrounding areas - station road is already unable to cope . • A New access Road from Chelvey Road to Grove Farm. Meaning all traffic from the 700 houses would emerge out on to the A370 at Backwell. - the 370 cannot cope with the increased traffic that 700 houses would bring nevermind the link roads . 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • New access roads at Rodney Road and Moor Lane on to Grove Farm - as above • New roads linking Nailsea. (depending on where Nailsea's 3,200 new houses are allocated). - ad above • Noise • Light pollution • Stress and extinction of some of our local wildlife including bats, Kingfishers, Otters etc . <p>Destroying the natural habitat of Backwell Common - taking away from the community a well used leisure route - used by both Backwell and Nailsea</p> <p>I oppose thus plan in totality</p> <p>A very concerned Backwell Resident.</p>	
K Roberts		<p>I have read nothing new in the local plan, this consultation has given me NO confidence in NSC and again they are not listening to local people in Backwell and surrounding areas. How can the local people put it any clearer its not difficult the proposed development will only turn Backwell into a massive car park and transport hub for people needing to commute to Bristol or Weston for their work commitments and only those people will benefit from any such proposal and at what expense?</p> <p>NSC seem to have no foresight what so ever working underhand, they are not transparent and are very unprofessional and are not to be trusted with the future of Backwell. PLUS I say again no one at NSC appear to be listening to local feelings despite all of the negative objections made and are continuing to be made about these plans and proposals. It is very unpopular with the majority of residents. Last year the local Backwell residents were put into a spin due to in considerate times and bad communications and we are now put into this position again having to put forward and reiterate comments, despite that NSC have exposed themselves to be incompetent PROCEEDING FORWARD REGARDLESS!</p> <p>I feel you NSC are hoping that residents will become fed up and miss these deadlines and ignore emails so that they can fudge the figures and manipulate the outcome.</p> <p>I can only reiterate some of the main points I have previously made so in summary and in no order of importance please see below:-</p> <ol style="list-style-type: none"> 1. The 700 houses planned to be built on Grove Farm will increase a small respected and cherished village by 40%. It does NOT reflect the agreed expansion under the Neighbourhood Plan (which was given a seal of approval by the Government) and will destroy the village feel. 2. The loss of arable agricultural land will only result in the destruction of valuable food producing services. Land which supports many species of endangered wildlife including the Greater Horseshoe Bat which has a well established colony at Brockley Hall Stables. The JSP proposal for mitigating this issue does NOT comply with relevant habitat regulations! 3. To reduce additional traffic congestion that would be created by such a development would require massive new infrastructure i.e. roads, drainage, bridges across flood plains, plus expanding GP surgeries and schools – the JSP does NOT explain how this would be achieved, I can see no plans for flood prevention, damage to greenbelt and destruction of nature conservation especially around Backwell lake and surrounding villages of Brockley and Chelvey. 4. Where are the long term job prospects in this area? <p>I am therefore interested in knowing the answers to the above and also the points below-</p> <ol style="list-style-type: none"> 1. Why are NSC jumping the gun before this plan has been reviewed by Government Inspectors? 2. Who will be responsible for monitoring the Governments dictate ensuring any house building company will comply with the 35% affordable housing requirements, should the green light be given? We cannot trust or rely on any house building company to honour this? they are only interested in financial gains for their shareholders and big bonuses for their Board and CEO – look at Jeff Fairbanks of Persimmon who ironically made his big fat bonus on the back of the Governments Help to Buy Scheme, a crime in itself! 3. Why won't NSC reconsider the Vale – yes it's greenbelt BUT has already been compromised by a £220m+ spend on a new metro bus route via the new South Bristol link road. This is where the main employment is and seems crazy to build so far away from this point with no one bothering to explain how this massive expense would be funded? <p>I along with many residents understand there is a need to build additional housing but these must be built in the right location so please therefore ensure my concerns are documented and my concerns taken into consideration.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
L Lees		<p>I find it very disturbing to see that you are apparently carrying on as if nothing at all had been said in objection to the JSP by a very large proportion of residents in Backwell, including myself - and as far as I can ascertain, by the populations of other afflicted areas around us as well.</p> <p>Please note; we are not being NIMBY about this issue. There is need for new housing being built throughout the country. However, the amount of infrastructure required for a new transport hub on top of the 700 houses in Backwell and a further 2500 in West End, Nailsea, will simply eradicate the nature of Backwell Village as a village and any sense of not being within the city of Bristol. You do have my comments on record from an earlier consultation on the JSP so I will not further belabour them here, save to say that we all will continue to voice - LOUDLY - our reasoned objections to these visions of a bright new future that are clearly someone's opium dream.</p>	
Long Ashton Parish Council	Long Ashton Parish Council	The impact of the development on surrounding settlements needs to be considered and mitigated as necessary. In particular, the effect of the proposed Station Road to A370 link which will increase traffic on the Long Ashton bypass, already adversely impacted by the SBLR.	
MLC		See attachment	E20.docx (16 KB)
Mr and Mrs Crooks		<p>In response to question 20:</p> <ul style="list-style-type: none"> - The new Station Road/A370 link would be detrimental to the local environment, causing significant negative ecological impact, especially on Backwell Lake. It would also damage the village feel as Nailsea and Backwell would no longer have any visual separation and effectively turn into one big settlement. - It is unclear how the link road would be delivered in advance of development - no detail is provided on where the funding for this major road is going to come from. - The report also fails to note that much of the land the road is intended to be built on is a flood plain and regularly floods. 	
Nailsea		<p>As indicated in the objections to the Nailsea and Backwell transport scheme the proposed road E3 to Farleigh does not offer much relief to Backwell unless another road is provided from the strategic development (MM) to the A370 west of Backwell. Clearly like Nailsea the number of houses being put forward is much too large for the Village to manage.</p> <p>Safety on Station Rd is all ready a great concern adding more children to the road will only make matters worse, could cause more accidents, exposure more children to car exhaust fumes</p> <p>The fact that a new primary school is required is of serious concern as nearly all primary school age children are taken to school by car thus further adding to conjection, polution accidents etc.</p>	
Portishead Town Council	Portishead Town Council	Concern that the highway proposals will exacerbate Portishead's commuting transport issues.	
S Griffiths		I am not against further housing here, but every time we hear about provision of <i>affordable</i> housing but never <i>suitable</i> housing for the elderly for Downsizing. We folk who have lived here for decades in villages like Backwell, duly paying our Council Tax, are being displaced from our comfort zones or feeling trapped in property which is too big for us to cope with. This is very distressing to us when you consider the services we use such as doctors surgeries, transport, shopping etc.. which is a lifeline for us.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Many of us would like to downsize to bungalows in the area which would in turn release any large family homes for the market.</p> <p>At present, there are too many bungalows disappearing from our villages, as they are bought up and, with your permission, made into houses thus depleting the chances for us older folk to downsize locally.</p>	
S roberts		<p>I have read nothing new in the local plan, this consultation is giving me NO confidence that NSC are listening to local people in Backwell and surrounding areas. How can the local people put it any clearer, the proposed development will only turn Backwell into a massive car park and transport hub for people needing to commute to Bristol or Weston for their work commitments and only those people will benefit from any such proposal and at what expense? I avoid Nailsea now because of the parking there is often no where to park, the facilities are not able cope now yet alone allowing more housing estates to develop in Backwell and Nailsea.</p> <p>No one at NSC appear to be listening to local feelings despite all of the negative but relative objections made and are continuing to be made about these plans and proposals. It is very unpopular with the majority of residents. Last year the local Backwell residents were put into a spin at a very inconvenient time and we are now put into this position again having to put forward and reiterate comments, despite that NSC have exposed themselves to be incompetent PROCEEDING FORWARD REGARDLESS!</p> <p>I feel you are hoping that residents will become fed up and miss these deadlines and ignore emails so that you can fudge the figures and manipulate the outcome.</p> <p>I can only reiterate some of the main points I have previously made so in summary and in no order of importance please see below:-</p> <ol style="list-style-type: none"> 1. The 700 houses planned to be built on Grove Farm will increase a small respected and cherished village by 40%. It does NOT reflect the agreed expansion under the Neighbourhood Plan (which was given a seal of approval by the Government) and will destroy the village feel. 2. The loss of arable agricultural land will only result in the destruction of valuable food producing services. Land which supports many species of endangered wildlife including the Greater Horseshoe Bat which has a well established colony at Brockley Hall Stables. The JSP proposal for mitigating this issue does NOT comply with relevant habitat regulations! 3. To reduce additional traffic congestion that would be created by such a development would require massive new infrastructure i.e. roads, drainage, bridges across flood plains, plus expanding GP surgeries and schools – the JSP does NOT explain how this would be achieved, I can see no plans for flood prevention, damage to greenbelt and destruction of nature conservation especially around Backwell lake and surrounding villages of Brockley and Chelvey. 4. Where are the long term job prospects in this area? <p>I am therefore interested in knowing the answers to the above and also the points below-</p> <ol style="list-style-type: none"> 1. Why are NSC jumping the gun before this plan has been reviewed by Government Inspectors? 2. Who will be responsible for monitoring the Governments dictate ensuring any house building company will comply with the 35% affordable housing requirements, should the green light be given? We cannot trust or rely on any house building company to honour this? they are only interested in financial gains for their shareholders and big bonuses for their Board and CEO – look at Jeff Fairbanks of Persimmon who ironically made his big fat bonus on the back of the Governments Help to Buy Scheme, a crime in itself! 3. Why won't NSC reconsider the Vale – yes it's greenbelt BUT has already been compromised by a £220m+ spend on a new metro bus route via the new South Bristol link road. This is where the main employment is and seems crazy to build so far away from this point with no one bothering to explain how this massive expense would be funded? <p>I along with many residents understand there is a need to build additional housing but these must be built in the right location so please therefore ensure my concerns are documented and my concerns taken into consideration.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Taylor Wimpey UK Ltd (DLP)	DLP Planning	<p>Section 4.3: Backwell: Proposed Vision for Development and How the Principles are Developing states that the proposed vision for the strategic development at Backwell is as follows: “Backwell will remain an attractive and vibrant village set on the edge of the Green Belt. A modified road network will facilitate expansion of the village and relieve pressure on Backwell Crossroads and Station Road and allow environmental improvements within the village. There will be improved access to the rail station and opportunities for walking and cycling. The new development will respect the setting of heritage features including the setting of nearby Chelvey.”</p> <p>TW are generally supportive of this proposed vision and the majority of the design principles set out for the Backwell SDL. However, they do question the rationale and justification of the second design principle whereby the Council require the delivery of the new Station Road to A370 link in advance of development commencing, coupled with modifications to Station Road. Transport Assessment modelling to support the pending planning application is indicating that there is sufficient capacity within Backwell crossroads (with minor highway improvements) to facilitate the additional transport movements generated by the entire Backwell SDL. At the very least TW would contend that there will be capacity to enable several phases of the Backwell SDL to come forward prior to the delivery of the proposed East of Backwell link between the station interchange and Farleigh. On this basis we would suggest that design principle 2 is changed to enable the Backwell SDL to come forward early in the plan period based on the available capacity identified through technical Transport Assessments.</p> <p>The Backwell SDL presents an opportunity to deliver housing early on in the plan period due to the lack of major constraints on the site and its non-reliance on significant strategic transport infrastructure.</p> <p>Section 4: Garden Villages and New Communities: Nailsea and Backwell Transport Schemes states on Page 30 of the NLPIO that: “In the context of supporting the strategic development locations at Nailsea and Backwell the emerging findings are suggesting the infrastructure could be delivered in a phased manner in step with housing build out”.</p> <p>The NLPIO then goes on to detail the Council’s proposed phasing for said infrastructure. As discussed in TW’s representations to previous stages of the NLP and JSP and above, TW believe that early development can be achieved at the Backwell SDL, supporting initial elements of strategic infrastructure.</p> <p>TW would support the NLP suggestion that the phasing of the infrastructure should be in step with the housing build out at Nailsea and Backwell. We believe this is achievable and that the delivery of the Backwell SDL in advance of the proposed phase 1 of the transport infrastructure is feasible because the Backwell SDL is not reliant on significant strategic transport infrastructure to support traffic movements.</p> <p>Section 4.3 of the NLPIO discusses the Backwell Strategic Development Location (SDL). The Context section states: “The proposed location is to the west of Backwell on land located outside the Green Belt. The development would need to be sensitively designed to integrate with the village and be appropriate for its rural setting. A development of this scale would require a new primary school, but most other local services and facilities would be found in the existing village centre. Transport improvements are essential to support delivery of the site in the context of the wider transport network which includes improved accessibility to Bristol and the wider principal road network. There is a need for improved accessibility to the rail station. This is an ecologically sensitive area particularly in relation to greater and lesser horseshoe bats and appropriate strategic mitigation will be required. Development will need to respect the settings of historic Chelvey and the West Town Conservation Area.”</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>In response to the above, TW again wish to stress that whilst it is recognised that there are major transport infrastructure improvements scheduled for the wider North Somerset area, the Backwell SDL is not dependent on all of these major transport projects coming forward.</p> <p>TW are supportive of the improved accessibility to the Nailsea and Backwell railway station. The emerging masterplan for the Backwell SDL proposes new pedestrian and cycle routes which integrate with, and consolidate the existing Public Rights of Ways (PROWs).</p> <p>It is recognised that the area to the south-west of the village, including parts of Grove Farm, are a critical area for horseshoe bat foraging and discussions have taken place with Natural England with regards to the impact of the development. New landscape buffers around the site boundaries are proposed, along with additional planting to improve accessibility to the wider countryside. It is the aim of the scheme to incorporate sufficient mitigation on-site to compensate for any habitat loss.</p>	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	<p>Q20. Do you agree with the principles set out for Backwell and would you suggest any changes to these?</p> <p>2.4 Section 4.3 sets out the proposed vision and principles for developing the sites. TW are generally supportive of this proposed vision and the majority of the design principles set out for the Backwell SDL. However, they do question the rationale and justification of the second design principle whereby the Council require the delivery of the new Station Road to A370 link in advance of development commencing, coupled with modifications to Station Road. Transport Assessment modelling to support the pending planning application is indicating that there is sufficient capacity within Backwell crossroads (with minor highway improvements) to facilitate the additional transport movements generated by the entire Backwell SDL.</p> <p>2.5 TW would contend that there will be capacity to enable several phases of the Backwell SDL, including the Rodney Road site, to come forward prior to the delivery of the proposed East of Backwell link between the station interchange and Farleigh. On this basis we would suggest that design principle 2 is changed to enable the Rodney Road and other phases of the Backwell SDL to come forward early in the plan period based on the available capacity</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>identified through technical Transport Assessments.</p> <p>2.6 The Backwell SDL presents an opportunity to deliver housing early on in the plan period due to the lack of major constraints on the site and its non-reliance on significant strategic transport infrastructure.</p> <p>2.7 Section 4: Garden Villages and New Communities: Nailsea and Backwell Transport Schemes states on Page 30 of the NLPIO document that:</p> <p>“In the context of supporting the strategic development locations at Nailsea and Backwell the emerging findings are suggesting the infrastructure could be delivered in a phased manner in step with housing build out”.</p> <p>2.8 The NLP then goes on to detail the Council’s proposed phasing for said infrastructure. As discussed in TW’s representations to previous stages of the NLP and the JSP and above, TW believe that early development can be achieved at the Backwell SDL, supporting initial elements of strategic infrastructure. Early phases such as the site at Rodney Road can support the Council to meet its housing need and maintain a 5 year land supply.</p> <p>2.9 TW would support the NLP suggestion that the phasing of the infrastructure should be in step with the housing build out at Nailsea and Backwell. We believe this is achievable and that the delivery of Rodney Road and other early phases of the Backwell SDL in advance of the proposed phase 1 of the transport infrastructure is feasible, because delivery of a site like Rodney Road is not reliant on significant strategic transport infrastructure to support traffic movements.</p> <p>2.10 Section 4.3 on the NLPIO discusses the Backwell Strategic Development Location (SDL). The Context section states:</p> <p>“The proposed location is to the west of Backwell on land located outside the Green Belt. The development would need to be sensitively designed to integrate with the</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>village and be appropriate for its rural setting. A development of this scale would require a new primary school, but most other local services and facilities would be found in the existing village centre. Transport improvements are essential to support delivery of the site in the context of the wider transport network which includes improved accessibility to Bristol and the wider principal road network. There is a need for improved accessibility to the rail station. This is an ecologically sensitive area particularly in relation to greater and lesser horseshoe bats and appropriate strategic mitigation will be required. Development will need to respect the settings of historic Chelvey and the West Town Conservation Area.”</p> <p>2.11 In response to the above, TW again wish to stress that whilst it is recognised that there are major transport infrastructure improvements scheduled for the wider North Somerset area, Rodney road and the wider Backwell SDL is not dependent on all of these major transport projects coming forward.</p> <p>2.12 TW are supportive of the improved accessibility to the Nailsea and Backwell railway station. The emerging masterplan for the wider Backwell SDL proposes new pedestrian and cycle routes which integrate with, and consolidate the existing Public Rights of Ways (PROWs). The site at Rodney Road is very well integrated with the existing village and in close proximity to existing facilities.</p>	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	<p>Q20. Do you agree with the principles set out for Backwell and would you suggest any changes to these?</p> <p>2.3 Section 4.3: Backwell: Proposed Vision for Development and How the Principles are Developing states that the proposed vision for the strategic development at Backwell is as</p>	

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		<p>follows:</p> <p>“Backwell will remain an attractive and vibrant village set on the edge of the Green Belt. A modified road network will facilitate expansion of the village and relieve pressure on Backwell Crossroads and Station Road and allow environmental improvements within the village. There will be improved access to the rail station and opportunities for walking and cycling. The new development will respect the setting of heritage features including the setting of nearby Chelvey.”</p> <p>2.4 The design principles for the development are detailed as follows:</p> <ul style="list-style-type: none"> • <i>Development to be well-related into the existing village.</i> • <i>New Station Road – A370 link to be delivered in advance of development</i> commencing coupled with modifications to Station Road. • <i>Design to safeguard and enhance existing heritage assets including the rural</i> setting of West Town Conservation Area and nearby listed buildings. Key plots and hedgerows to be retained to safeguard the open setting. <p>7</p> <ul style="list-style-type: none"> • <i>The setting of Grove Farm including views from the main elevation should be</i> protected and the form of development in the immediate vicinity of the complex should respect its historic nature. • <i>Design and materials applied to new buildings surrounding Grove Farm</i> should reference the historic palette and styles with a lower density to create a historic core to the development. • <i>Retention of historic hedgerows will help preserve the character of the area,</i> and the reinstatement of historic orchards within the new development should be investigated. These are shown indicatively on the concept 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>diagram.</p> <ul style="list-style-type: none"> • <i>Historic field names should be considered for application within the new development to contribute to the historic value of the site.</i> • <i>Development form and layout to developed taking into account views to and from Chelvey to the northwest of the development.</i> • <i>Strategic ecological habitat mitigation to be delivered including onsite features and links to wider strategic mitigation.</i> • <i>Surface water will be managed effectively including potential for on or near site attenuation, and using a catchment based approach to managing water.</i> • <i>Green infrastructure will feature as a key element of the development linking through and surrounding development and offering a soft transition to surrounding countryside on the western side. This will be interconnected and multifunctional having ecological, recreational, and environmental benefits.</i> • <i>Cycle and pedestrian links will be made into Backwell from the new development providing access to the station. New and improved routes will also be located to facilitate views to surrounding landmarks including St Bridgets Church in Chelvey.</i> • <i>Station Road will be improved with a new access to the A370 helping to address congestion at Backwell Crossroads.</i> • <i>A new primary school will form a focal point within the development located to offer safe and convenient walking routes to surrounding development.</i> <p>2.5 TW are generally supportive of this proposed vision and the majority of the design principles set out for the Backwell SDL. However, they do question the rationale and justification of the</p>	

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		<p>second design principle whereby the Council require the delivery of the new Station Road to A370 link in advance of development commencing, coupled with modifications to Station Road. Transport Assessment modelling to support the pending planning application is indicating that there is sufficient capacity within Backwell crossroads (with minor highway improvements) to facilitate the additional transport movements generated by the entire Backwell SDL. At the very least TW would contend that there will be capacity to enable several phases of the Backwell SDL to come forward prior to the delivery of the proposed East of Backwell link between the station interchange and Farleigh. On this basis we would suggest that design principle 2 is changed to enable the Backwell SDL to come forward early in the plan period based on the available capacity identified through technical Transport Assessments.</p> <p>2.6 The Backwell SDL presents an opportunity to deliver housing early on in the plan period due to the lack of major constraints on the site and its non-reliance on significant strategic transport infrastructure.</p> <p>2.7 Section 4: Garden Villages and New Communities: Nailsea and Backwell Transport Schemes states on Page 30 of the NLPIO that:</p> <p>“In the context of supporting the strategic development locations at Nailsea and Backwell the emerging findings are suggesting the infrastructure could be delivered in a phased manner in step with housing build out”.</p> <p>2.8 The NLPIO then goes on to detail the Council’s proposed phasing for said infrastructure. As discussed in TW’s representations to previous stages of the NLP and JSP and above, TW believe that early development can be achieved at the Backwell SDL, supporting initial elements of strategic infrastructure.</p> <p>2.9 TW would support the NLP suggestion that the phasing of the infrastructure should be in step</p>	

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		<p>with the housing build out at Nailsea and Backwell. We believe this is achievable and that the delivery of the Backwell SDL in advance of the proposed phase 1 of the transport infrastructure is feasible because the Backwell SDL is not reliant on significant strategic transport infrastructure to support traffic movements.</p> <p>2.10 Section 4.3 of the NLPiO discusses the Backwell Strategic Development Location (SDL). The Context section states:</p> <p>“The proposed location is to the west of Backwell on land located outside the Green Belt. The development would need to be sensitively designed to integrate with the village and be appropriate for its rural setting. A development of this scale would require a new primary school, but most other local services and facilities would be found in the existing village centre. Transport improvements are essential to support delivery of the site in the context of the wider transport network which includes improved accessibility to Bristol and the wider principal road network. There is a need for improved accessibility to the rail station. This is an ecologically sensitive area particularly in relation to greater and lesser horseshoe bats and appropriate strategic mitigation will be required. Development will need to respect the settings of historic Chelvey and the West Town Conservation Area.”</p> <p>2.11 In response to the above, TW again wish to stress that whilst it is recognised that there are major transport infrastructure improvements scheduled for the wider North Somerset area, the Backwell SDL is not dependent on all of these major transport projects coming forward.</p> <p>2.12 TW are supportive of the improved accessibility to the Nailsea and Backwell railway station. The emerging masterplan for the Backwell SDL proposes new pedestrian and cycle routes which integrate with, and consolidate the existing Public Rights of Ways (PROWs).</p> <p>2.13 It is recognised that the area to the south-west of the village, including parts of Grove Farm,</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		are a critical area for horseshoe bat foraging and discussions have taken place with Natural England with regards to the impact of the development. New landscape buffers around the site boundaries are proposed, along with additional planting to improve accessibility to the wider countryside. It is the aim of the scheme to incorporate sufficient mitigation on-site to compensate for any habitat loss.	
The Belmont Estate	Ridge and Partner LLP	We suggest that the principles for development at Backwell need to take into account that any new highways infrastructure to support the development needs to take into account the effect of the proposals on designated heritage assets such as that at the Belmont Estate. This is not currently reflected in the principles and is an important point, as highlighted above, and also as highlighted by Historic England in response to the JSP consultation.	
WENP	West of England Nature Partnership	We strongly support the principle of addressing ecological issues both through on-site measures as well as through a more strategic solution which considers wider ecological networks and the landscape scale, but would expect an explicit reference to the solution as delivering net gains in biodiversity. We support the trialling of strategic solutions such as Natural England's district licencing among others.	

Document Part Name

Q21. Do you have any comments on the concept diagrams and alternative scenarios set out?

Respondent Name	Respondent Organisation	Comment	Attached documents
A Blacklock		<p>I am writing to oppose the 2036 vision for the green belt valley between Nailsea Town and Towerhouse Wood.</p> <p>Development of this valley would be highly detrimental to the environment due to increased traffic, noise and pollution. This location would result in all residents having to travel by car as local amenities and connections to other modes of transport will not be possible on foot.</p> <p>This would put local roads under more pressure and as they are already in a state of disrepair with hundreds of potholes etc, the problem will merely be exacerbated during and after the development period.</p> <p>Furthermore, wildlife will be displaced, increased surface run off will affect the Yeo River quality, there will be an increased chance of flooding that is already a common occurrence and overall health of both people and wildlife will be affected.</p> <p>I trust to have served you with my views and that the above will be considered, resulting in this disastrous vision to be extinguished.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Avon Wildlife Trust	Avon Wildlife Trust	No comment	
BJ Allsop		<p>A. I note that all the proposed solutions to the Backwell situation as well as that of the villages along the A370 and even along the A38 (due to the new Bristol South Link) depend on crossing the River Avon at the Cumberland Basin. Even the proposed new road traffic routes merely move traffic congestion away from such current choke points as the Station Road/A38 traffic lights to the A370 closer to Bristol and will result in major traffic chaos from the Cumberland Basin back down the A370 (and A38) towards Backwell (or towards WSM in the worst case). There is basically no solution to this traffic congestion without a major re-routing of traffic within Bristol so as to reduce the traffic load on the Cumberland Basin. The tinkering with the "Transport Hub" to enable cyclists and pedestrians easier access to the station will not materially change the traffic congestion problem. In fact due to the railway line having to accommodate express trains, the options for laying on further trains to accommodate the new builds is less than it may appear at first. Finally the Metrobus is looked upon as the universal solution to Bristol traffic problems but is completely unproven especially for lengthy trips such as Backwell to Bristol. It might require an awful lot of Metrobuses.</p> <p>I have lived in the Los Angeles area for many years and the development of huge flyovers and high speed roads could solve this problem by enabling the heavy traffic coming in over the Cumberland Basin to "fan out" to the various areas of Bristol. However the cost would be huge and Bristol would be forever changed. It would probably need a high level motorway bridge over the Avon Gorge.</p> <p>B. There is a requirement to build new roads in the Backwell Common Green Belt which would essentially destroy this wonderful ribbon of peace and tranquility between Backwell and Nailsea. The peaceful tranquility with grazing cattle and babbling brooks which is one of the major rewards of living in the Backwell/Nailsea area would be lost for ever. More than 15,000 people live within ten miles of this Green Belt and enjoy this amenity. What is especially perplexing is why the North Somerset Council would not survey the possibility of moving much of the proposed development to The Vale, apparently on the grounds that it is also Green Belt. My suggestion is that a review of the relative viability of the Backwell Common Green Belt vs the Vale Green Belt be undertaken. On the face of it The Vale Green Belt is much more suited for large scale development as it would reduce the distances needed to be travelled to access Bristol by 90% with corresponding reductions in pollution and fuel use. Many much cheaper routes could be constructed with many small crossings of the Avon and cause the traffic to fan out over Bristol and the use of Metrobus would be much more effective due to the shorter distances as would pedestrian and cycle traffic. What makes one Green Belt subject to destruction while keeping another neighbouring one which is not enjoyed by as large a population? Surely it is reasonable to review this situation.</p>	
Blagdon PC	Blagdon Parish Council	We have no specific comments.	
F Parry		<p>I believe it is too early to be considering alternative scenarios given that proposed development does not have approval yet at JSP level.</p> <p>I am greatly concerned that the concept diagrams appear to show the western corner of the Backwell Playing Fields forming part of the proposed development.</p>	
J Howard		Alternative scenario 1 delivers more housing and development including employment space closer to the station, which is key to creating a sustainable long term solution and avoiding the need for Backwell to be fundamentally changed by 700 homes, which changes it from a 'service village'.	
J Howard		Development in Nailsea needs to be more closely located to the station i.e. south as opposed to West. The strategic gap needs to reflect this sustainable approach Alternative scenario 1 has started to suggest. It is much more sensible but the strategic gap could still be altered further to enable more sustainable development to the south closer to the station, which could include employment space, increased parking provision. This would reduce need to west of Nailsea and also in Backwell.	

Respondent Name	Respondent Organisation	Comment	Attached documents
JemB		The area around the north of the town between Nailsea ad Wraxall is not only flood plain but contains on archaeological site and several listed sites and is adjacent to the protected Tyntesfield estate. Given rising sea levels and increased water run off it is suggested this is examined a future country park. Build it was a community asset to protect the otters, water voles etc and wild flowers, as an aid to mental and physical health. (See JSNA data on mental health levels)	
John Miners		The effect that the Grove Farm development, (Backwell) would have on West End hamlet, has not been considered. Currently Netherton Wood Lane is used as a "RAT RUN" between the M5 junction 20 and Backwell, A370. Netherton Wood Lane, would suffer increased volumes of traffic during construction and following this expansion of Backwell. A relief road should be seriously considered before such development.	
Lesley Hegarty		A Banwell bypass will simply create major traffic problems for neighbouring villages. More imaginative traffic planning should be adopted. The cost and environmental damage and traffic congestion in other villages means the bypass will fail a cost/benefit analysis.	
Mark Funnell, Planning Adviser, National Trust	National Trust	<p>Our response to the Nailsea and Backwell proposals, and their associated highway infrastructure, stems from the Trust owning and caring for special places including Tyntesfield to the east of Nailsea, and Cadbury Camp on the Tickenham ridge.</p> <p>All the scenarios show the same indicative road link eastwards to the A370, so we have no specific comments on the relative merits of the scenarios.</p> <p>It is however noted that on page 32, in the "Plan A: Clevedon to Bristol transport schemes" diagram, there is a blue line showing the proposed new road from Nailsea/Backwell crossing the railway and joining the A370 at Farleigh. It is understood that this would involve an underbridge to cross the railway. This proposal is likely to have much less impact on the views and setting of the historic parkland and other heritage assets at Tyntesfield than the indicative route set out in the Joint Spatial Plan.</p> <p>Also in relation to "Plan A: Clevedon to Bristol transport schemes", and as we have noted in relation to the Joint Spatial Plan, the "long term potential link" to the M5 junction 20 shown in yellow would run across open countryside could negatively impact on the wider landscape, and on the views and settings of heritage assets such as Cadbury Camp on the Tickenham Ridge.</p>	
Mr and Mrs Crooks		<p>In response to question 21:</p> <p>- This highlights the importance of maintaining a 'strategic gap' between Nailsea and Backwell. However, we feel that the scale of the concept diagrams fail to show that the proposed new road (Hanham Way to Station Road) will virtually fill the entirety of the gap, which only consists of a single field at the narrowest point. This single field is also the only area that the station car park could be extended, and we understand that this is also being proposed.</p>	
Portishead Town Council	Portishead Town Council	Concern that the highway proposals will exacerbate Portishead's commuting transport issues.	
R Wood		Because of the usual lack of Infrastructure the effect of The Grove Farm Dev at Backwell would increase further still the amount of traffic using Nailsea wall Lane and Netherton would lane as a Rat Run from the M5 Clevedon to Backwell. a relief road would need to be in place before this is a viable option.	

Respondent Name	Respondent Organisation	Comment	Attached documents
SGD30		AS1 looks like best option with its delivery of housing and employment locations close to station, both key to long-term sustainability of village.	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	Section 4 sets out an alternative development scenario for Backwell which considers further development towards Chelvey Lane at Backwell and notes that development in this direction may impact upon the open setting of this part of Backwell. TW are supportive of the current extent of the Backwell SDL and its indicative capacity of 700 dwellings. We would however note that there is a balance to be had between the overall land take of the Backwell SDL and reflecting the design principles currently proposed in terms of provision, e.g. green infrastructure, recreation space and development density, etc.	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	<p>Land at Grove Farm, land at Burnt House Farm and Rodney Road, Backwell has been identified as one of the SDLs in the JSP due to its highly sustainable location. TW fully support and endorse the identification of the Backwell SDL as a location for sustainable housing development. TW believe that development at Grove Farm would serve as a catalyst for further growth in the area and support the delivery of the identified strategic infrastructure. An enclosed Site Location Plan (Appendix 1) shows the location of the site.</p> <p>Site Context</p> <p>The Backwell SDL is within Flood Zone 1, it is not located within the Area of Outstanding Natural Beauty (AONB) or Conservation Area and is not within a Site of Special Scientific Interest (SSSI).</p> <p>The site is situated to the west of Backwell's settlement boundary and approximately 900 meters from Backwell village centre. The overall vision for the development is to deliver a sustainable urban extension to the west of Backwell, which is fully integrated into the existing village.</p> <p>A small proportion of the site, between Chelvey Road and the A370, is within the Green Belt, however the emerging masterplan does not include any buildings on this part of the site. This section of the site is currently proposed to be used for school playing fields and enabling transport infrastructure, thereby retaining the openness of the Green Belt in this location.</p> <p>With the exception of a handful of properties at West Town and Moor Lane to the north, the landholdings do not generally abut residential properties. They do, however, abut public open space and a children's play area to the north and West Leigh Infant School and Backwell Playing Fields to the west. It can therefore be concluded that the site is not subject to any fundamental physical development constraints.</p> <p>The site has good links to existing public transport infrastructure. The railway line runs to the north of the site and Nailsea and Backwell Station is on the railway line linking Weston-super-Mare (WsM) to Bristol City Centre and beyond. The village is therefore on the main transport corridor to both Bristol and WsM. There are existing footpath links to the north of the site that provide direct access to the station.</p> <p>TW, as one of the major national housebuilders, have a proven record of delivering large scale housing sites throughout the UK. Development at the Backwell SDL can be brought forward early in the plan period, allowing for elements of the infrastructure to be delivered alongside much needed new housing development.</p> <p>An outline application is in preparation and is to be submitted to North Somerset Council early in 2019. Taking into account the time taken to obtain outline planning permission, reserved matters approval and the discharge of all pre-commencement conditions, it is anticipated that work will commence on site in 2022.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>It is estimated that initial delivery of residential units on the site would occur in 2023. It is suggested that development would occur initially on the Rodney Road parcel to the north of the site, where around 65 units could be delivered early-on over an 18-month period (completed by 2024/25). During this period, the necessary site access infrastructure proposed at the southern end of the site would be built and delivered by 2024. From then on this would allow for the delivery of further housing development.</p> <p>TW are in the process of producing a masterplan of the site. Vehicular site access will be taken off the A370 in the form of a new roundabout. The primary route extending from this access point is configured in a loop and designed to accommodate a cycle/pedestrian only route through to Station Road. A network of secondary and tertiary routes supports the spine road to form a sustainable circulation strategy, employing the principles of streets hierarchy and legible environment and enabling pedestrian/cycle access back to existing village facilities to the north-east.</p> <p>Access to the parcel at the north-east corner of the site is to be provided separately off Rodney Road, to serve circa 65 dwellings on that parcel, with no through routes into the remaining residential parcels.</p> <p>Retail/community uses are proposed on the site, along the primary route, and a 2FE school is proposed near the site entrance. New pedestrian and cycle routes are proposed to integrate with and consolidate the existing Public Rights of Ways (PROWs). The network of proposed and existing pedestrian routes are incorporated in the green infrastructure, forming an attractive setting to the residential parcels.</p> <p>The north-south PROW is proposed to be upgraded to a cycle route to assist in enhancing connectivity to Backwell, while situated within the substantial proposed green open space at the western edge of the proposal. This green amenity space, on the western slope of the ridge, provides an ecological buffer for the existing wildlife habitat and softens the transition from the developable area to the open countryside, as well as affording extensive views out to the west, towards the open countryside and to St Bridget's Church.</p> <p>Additional substantial green amenity spaces are proposed at the southern edge of the site, as part of the Green Belt, and along the existing north-south drainage ditch, forming part of a green-blue corridor, contributing to the scheme's drainage strategy. Attenuation basins and swales incorporated within the western green open space will support the green-blue corridor to form the drainage strategy, while providing an opportunity to enhance biodiversity and wildlife habitat.</p> <p>The proposed layout has been designed to allow for sufficient depth of residential parcels, allowing active frontages onto the public realm and promoting a sense of security and passive surveillance.</p> <p>The land at the Backwell SDL is already assembled. The whole of the site is within the ownership of three parties (Land at Grove Farm, Land at Burnt House Farm and Rodney Road) and TW benefit from signed Option agreements. There are no legal or ownership barriers to the site coming forward for development.</p> <p>Conclusions</p> <p>As set out above, TW support the preparation of the NLP and the identification of Land at Grove Farm, Backwell as a suitable location for housing development. TW have the following main representations:</p> <ul style="list-style-type: none"> • TW are broadly in agreement with the issues and challenges identified in the NLP regarding the Backwell SDL and note the potential consideration of local Green Belt amendments to form a permanent boundary alignment along the access to the Backwell SDL from the A370; • TW are generally supportive of the proposed vision and the majority of the design principles set out on the Backwell SDL. However, they do question the rationale and justification of the second design principle whereby the Council require the delivery of the new Station Road to A370 link in advance of development commencing; • TW are supportive of the current extent of the Backwell SDL and its indicative capacity of 700 dwellings and do not consider there to be any other alternative options to accommodate strategic growth at Backwell due to the existing Green Belt designation; • TW contend that the NLP policy on affordable housing should be compliant with the revised NPPF and supported by an appropriate viability assessment that ensures the delivery of SDLs in North Somerset is not undermined by a combination of on/off site infrastructure, CIL and affordable housing requirements; and • Taking into account the time taken to obtain outline planning permission, reserved matters approval and the discharge of all pre-commencement conditions, it is anticipated that work could commence on site in 2022. It is estimated that initial 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		delivery of residential units on the site would occur in 2023 with completion of the whole site by 2033. The Backwell SDL has the potential to be an early delivering strategic site.	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	<p>Q21. Do you have any comments on the concept diagrams and alternative scenarios set out?</p> <p>2.14 Section 4 sets out an alternative development scenario for Backwell which considers further development towards Chelvey Lane at Backwell and notes that development in this direction may impact upon the open setting of this part of Backwell. TW are supportive of the current extent of the Backwell SDL and its indicative capacity of 700 dwellings. We would however note that there is a balance to be had between the overall land take of the Backwell SDL and reflecting the design principles currently proposed in terms of provision, e.g. green infrastructure, recreation space and development density, etc.</p>	
Wessex Water (Ruth Hall)	Wessex Water	Detailed engineering appraisal will be required to consider foul drainage arrangements for proposed development and the nature of off site capacity improvements. Alternative scenarios 2 and 4 are close to main sewers draining the area, no preference is discernible at this time.	
Wraxall	Mrs	it would seem sensible to allocate new housing for Nailsea to the South of the town, to be near the Railway station. Nailsea will always be a commuter town, and it is vital that commuters can use the excellent Nailsea and Backwell station. Difficult to comment on the suitability between one or the other.	
Wrington Parish Council	Wrington Parish Council	Scenario 1 would enhance further the strategic gap between Nailsea and Backwell, and be further away from the railway line, although more impactful on West Town.	
Wrington Village Alliance		only one alternative is described so it is not appropriate to respond on alternatives	
Document Part Name	Q22. Are there any other options you would add for accommodating strategic growth within Backwell?		

Respondent Name	Respondent Organisation	Comment	Attached documents
A Sutherland		I would suggest that Backwell's Neighbourhood Plan is followed to allow for sustainable housing growth in the area rather than a totally inappropriate development proposed in this document.	
Avon Wildlife Trust	Avon Wildlife Trust	No comment	
Backwell Parish Council	Backwell Parish Council	<p>Question 22: Are there any other options you would add for accommodating strategic growth within Backwell?</p> <p>Should development be required to the west of Backwell, any proposals should be closely related to the existing built area and avoid significant incursions into the open countryside which would be harmful to the setting of Backwell and the intrinsic character of the landscape surrounding the village. BPC would resist the extension of development further towards Chelvey Lane which has the potential to adversely affect the setting of the village and the West Town Conservation Area and could prejudice a particularly critical foraging area for the Greater and Lesser Horseshoe bats. Furthermore, the extension of development to the west would result in longer journeys from new homes to existing village facilities, therefore encouraging short trips by car.</p> <p>BPC remains of the opinion that Backwell village is not a suitable location for strategic growth, for the reasons set out within this response and its representations to the JSP. The proposed SDL to the west of Backwell has been selected due to its location beyond the Green Belt which envelopes most of the village to the north, east and south. However, the SDL's capacity to accommodate strategic scale growth without significant harm to valued assets is highly questionable, as outlined within the BPC's representations to the JSP.</p> <p>The Backwell Neighbourhood Plan supports new housing development of a scale which is appropriate to the character of the village. The Parish Council would support the development of non-strategic scale development which complies with the Neighbourhood Plan and NSC's Local Plan settlement hierarchy and would be capable of delivery without significant adverse impacts upon the local community and environment.</p>	
BJ Allsop		<p>A. I note that all the proposed solutions to the Backwell situation as well as that of the villages along the A370 and even along the A38 (due to the new Bristol South Link) depend on crossing the River Avon at the Cumberland Basin. Even the proposed new road traffic routes merely move traffic congestion away from such current choke points as the Station Road/A38 traffic lights to the A370 closer to Bristol and will result in major traffic chaos from the Cumberland Basin back down the A370 (and A38) towards Backwell (or towards WSM in the worst case). There is basically no solution to this traffic congestion without a major re-routing of traffic within Bristol so as to reduce the traffic load on the Cumberland Basin. The tinkering with the "Transport Hub" to enable cyclists and pedestrians easier access to the station will not materially change the traffic congestion problem. In fact due to the railway line having to accommodate express trains, the options for laying on further trains to accommodate the new builds is less than it may appear at first. Finally the Metrobus is looked upon as the universal solution to Bristol traffic problems but is completely unproven especially for lengthy trips such as Backwell to Bristol. It might require an awful lot of Metrobuses.</p> <p>I have lived in the Los Angeles area for many years and the development of huge flyovers and high speed roads could solve this problem by enabling the heavy traffic coming in over the Cumberland Basin to "fan out" to the various areas of Bristol. However the cost would be huge and Bristol would be forever changed. It would probably need a high level motorway bridge over the Avon Gorge.</p> <p>B. There is a requirement to build new roads in the Backwell Common Green Belt which would essentially destroy this wonderful ribbon of peace and tranquility between Backwell and Nailsea. The peaceful tranquility with grazing cattle and babbling brooks which is one of the major rewards of living in the Backwell/Nailsea area would be lost for ever. More than 15,000 people live within ten miles of this Green Belt and enjoy this amenity. What is especially perplexing is why the North Somerset Council would not survey the possibility of moving much of the proposed development to The Vale, apparently on the grounds that it is also Green Belt. My suggestion is that a review of the relative viability of the Backwell Common Green Belt vs the Vale Green Belt be undertaken. On the face of it The Vale Green Belt is much more suited for large scale development as it would reduce the distances needed to be travelled to access Bristol by 90% with corresponding reductions in pollution and fuel use. Many much cheaper routes could be constructed with many small crossings of the Avon and cause the traffic to fan out over Bristol and the use of Metrobus would be much more</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		effective due to the shorter distances as would pedestrian and cycle traffic. What makes one Green Belt subject to destruction while keeping another neighbouring one which is not enjoyed by as large a population? Surely it is reasonable to review this situation.	
Blagdon PC	Blagdon Parish Council	We have no specific comments other than there must be close coordination between employment, transport and housing development plans. Transport plans must ensure minimal disruption or longer term impact on transport links serving adjacent communities.	
D.Hayler		<p>The unwillingness of NSC to consider housing development at Long Ashton alongside the new ring road and infrastructure for Bristol is perverse in the extreme. The argument for 'green belt' protection cannot be justified when the alternatives it forces for growth in Backwell and Nailsea are considered, and I believe it is disingenuous. It appears motivated by party politics, rather than actual consideration of the extant circumstances the area is facing and of the issues involved. The suggestion that the new growth in both these areas will form anything other than dormitories for Bristol is at best misguided, and the wider impact on NS as a whole is therefore far greater in terms of infrastructure and transport than is suggested.</p> <p>It is hard to envisage how there can be any element of true 'Local Planning' that excludes serious consideration of this option; consideration of this option is an essential element of this plan.</p>	
F Parry		No, apart from reducing the number of proposed households dramatically and spreading them around the village area rather than focusing on a single "housing estate", the only option I support for accommodating strategic growth within Backwell is the Village Neighbourhood Plan. I would suggest that reassessing greenbelt allocations at "The Vale" would be a far more effective way to meet national homebuilding targets.	
H Parry		<p>Backwell has been identified as a 'Highly Sustainable' village following the adoption of the Neighbourhood Plan (2016-2026 and officially approved in 2015), promoting gradual development. This is not a village of NIMBYs, but a village that supports sensible and sustainable development, ensuring the fabric and character of the local village and environment is maintained for the benefit of both existing and new residents.</p> <p>This proposal is completely unsustainable and would have a detrimental environmental impact (doubling the size of an existing village, overwhelm local services, ruinous traffic on already overstretched infrastructure, increased pollution, loss of rare wildlife habitats).</p>	
J Howard		There should be more focus on Nailsea, which has the greater ability to accommodate growth, given the scale of the town centre, which needs additional economic support. There are also fewer constraints and more sustainable development options, especially to the south, as outlined in Alternative scenario 1, being closer to the station and largely former coal mining areas. An effective strategic gap is still achievable with Alternative scenario 1 as demonstrated.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Portishead Town Council	Portishead Town Council	Concern that the highway proposals will exacerbate Portishead's commuting transport issues.	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	TW do not consider there to be alternative options to accommodate strategic growth at Backwell due to the existing Green Belt designation.	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	<p>Q22. Are there any other options you would add for accommodating strategic growth within Backwell?</p> <p>2.15 TW do not consider there to be alternative options to accommodate strategic growth at Backwell due to the existing Green Belt designation.</p>	

Document Part Name

Q23. Do you have any comments on the proposed vision for Nailsea?

Respondent Name	Respondent Organisation	Comment	Attached documents
A Bryant		<p>Given the choice, I would prefer for homes to be built closer to Bristol and major employment centres. However, if a significant number of homes must be built in the Nailsea area, it makes most sense to develop to the south of Nailsea, within walking distance of the train station (so the car park size is less of an issue), closer to existing cycle and transport links and closer to the airport.</p> <p>The new road proposals should help alleviate the existing pinch points of Station Road crossroads and Stone Edge Batch, whereas Nailsea Town Council's proposal for a northern link road would neatly link two major pinch points (Wraxall village and Stone Edge batch), while at the same time bypassing perhaps the most suitable piece of road for large lorries between Wraxall and Clevedon i.e. Stock Way North. There is already a road from Bristol to Tickenham bypassing Nailsea - the B3128. While the B3130 through Wraxall village could potentially accommodate some more cars, it is very narrow in parts and cannot cope with lorries and buses, especially when they pass each other. There is little scope to widen this road due to the close proximity of village homes to the roadside.</p> <p>In addition, developing to the north is unsuitable for the following reasons:</p> <ol style="list-style-type: none"> 1. The land is designated greenbelt. Any proposal to 'replace' greenbelt removed from one area by adding greenbelt somewhere else is disingenuous and is not how planning works. If this were to be permitted, it would set a dangerous precedent and would give the green light to speculative developers and the destruction of protected countryside nationwide. 2. The land around the Land Yeo is prone to flooding throughout the year (much of the northern bank is underwater as I write). Any development on either side of the river would create considerable additional run-off and exacerbate the existing flooding problems, possibly causing problems further downstream. It could also cause pollution within the river itself. 3. Nailsea Town Council cites more employment as a potential reason to justify a removal of greenbelt to the north of Nailsea. However, many of the existing warehouse units in Nailsea are now unoccupied or have been repurposed as gyms etc. The Coates House office block is currently being converted into flats, which suggests that there is 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>insufficient demand even for the existing employment sites. Given the lack of space even for much needed housing, it is naive to think that Nailsea could ever create sufficient employment opportunities to shed its image as a dormitory town, especially with an additional 2,500 homes.</p> <p>4. The northern site is further from the train station than the proposed areas to the south and west and would require commuters to either drive (and need to park at the station, or encourage parking in residential areas such as Trendlewood Way) cycle or use additional public transport. There is much more scope to run double decker buses and/or a Metrobus link using the proposed new links to the A370 than through Wraxall village.</p> <p>5. The land to the north east of Nailsea is a beautiful open green space which is regularly used by both Wraxall and Nailsea residents alike for recreational purposes. The Ty Sculpture trail through Tower House Wood is very popular with young families, and a development much closer to the Wood would ruin this space.</p>	
Aston	Aston and Co UK	<p>Development at the existing larger settlements is more sustainable and more rapidly deliverable than the Garden Village proposals. The proposed new road to access from the A370 to Station Road will open that land for development but without a radically improved public rapid transportation system congestion will be increased.</p> <p>Live-Work units that make use of the roll out of fibre to the premises and produce opportunities for small scale business start-up without creating outward commuting should be utilised.</p> <p>Local Employment land integrated and well connected with new housing is essential to reduce out commuting.</p> <p>Infrastructure Investment must be implemented ahead of new housing.</p> <p>Connectivity of new housing to the station by effective frequent green public transport is essential.</p>	
B Hanson		<p>The proposals for the development of Nailsea completely ignore the wishes and opinions of local residents and the Town Council. Development to the south and west would be on some of the most fertile and attractive land that surrounds the town. Furthermore, it would bring Nailsea over the Morgans Hill ridge making it visible from Backwell and the A370 and thus effectively merging the two settlements of Nailsea and Backwell. That area also has one of the largest habitats of bats in the southwest which would be destroyed having a knock on effect on other wildlife. Despite the proposals to build a new road surrounding the town the traffic along Netherton Wood Lane, Chelvey Road and Brockley Lane, which would remain the principal access to the A370 going south and to the airport all of which are basically single track lanes with passing places, would increase very substantially. These lanes already suffer log jams and further development on this side of Nailsea would exacerbate the problem with no possibility of a solution. Development on this side of town would mean the centre of the town would be located at the north with accessibility being too far to walk, thus making residents dependent on either public transport or private cars - both of which would not be environmentally friendly. I also agree with many of the other comments that it is premature to produce a plan ahead the JSP.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Backwell Parish Council	Backwell Parish Council	The Plan is premature pending the outcome of the JSP. Alternative sites should have been chosen. In conflict with the Core Strategy settlement hierarchy. Backwell will cease to be sustainable of the proposed development takes place. No evidence that the necessary transport and other infrastructure can be delivered. Proposed road would destroy the cherished strategic gap.	Backwell Parish Council interim response.pdf (167 KB)
Backwell Parish Council	Backwell Parish Council	BPC supports the vision to retain the gap between Nailsea and Backwell to safeguard their separate identities and accommodate attractive and convenient walking and cycling routes to the station.	
Barton Willmore on behalf of Linden Homes	Barton Willmore	<p>These representations are submitted by Linden Homes on behalf of the landowners in response to the North Somerset Local Plan 2036 Issues and Options consultation in respect of their land interests at Youngwood Lane, South West Nailsea. A site location plan is found in appendix 1.</p> <p>The publication JSP makes provision for 105,500 homes and identifies 12 Strategic Development Locations (SDLs) to accommodate the housing needed in the West of England.</p> <p>Policy 7 of the emerging JSP identifies a Strategic Development Location at South West Nailsea for a mix of uses including up to 2,575 dwellings and 10.5 ha of employment, the general extent of which is shown on the JSP Key Diagram, copied below. The JSP notes that the site has capacity for an additional 725 dwellings beyond the JSP Plan period of 2036. The Nailsea SDL will also deliver a new local centre, a secondary school and 4 primary schools along with a variety of transport improvements.</p> <p>The JSP indicated that the general extent of the SDL would be further assessed and refined through the North Somerset Local Plan.</p> <p>Page 29 of the North Somerset Local Plan Issues and Options document states:</p> <p>“This Issues and Options document provides an update on how the proposals are being refined and developed. This will lead to detailed allocations in the Local Plan 2036 and take into account any changes resulting from the JSP examination process”</p> <p>The North Somerset Local Plan 2036 Issues and Options sets out a proposed vision and emerging principles for growth at Nailsea, as well as 4 options for the scale and location of the SDL.</p> <p>A Strategic Development Location at South West Nailsea is supported and these representations are submitted to demonstrate that the site at Youngwood Lane is being promoted and is available for development as part of the South West Nailsea growth area.</p> <p>THE SITE AND ITS SURROUNDINGS</p> <p>The site promoted in these representations comprises agricultural land north of Youngwood Lane, south West Nailsea. The site is in flood zone 1 (suitable for residential) and is not covered by any national environmental designations. The North Somerset Local Plan proposals map shows that only a very small part of the site - limited to the northeastern triangle of land (north of the farmhouse) - is covered by any local designation which is a small local wildlife site. 90% of the site is free of national and local environmental designations and suitable for residential development.</p> <p>Whilst the Local Plan 2036 Issues and Options document is not accompanied by a sustainability appraisal (SA), we note that an appraisal was undertaken of policy 7.7 (Nailsea SDL) for the JSP. This found mainly positive relationships across all SA objectives, with the exception of 4c (minimise impact on and where appropriate enhance valued landscapes), 4d (maximise the re-use of previously developed land) and 4e (minimise loss of productive farmland, especially best and most versatile agricultural land).</p> <p>However, we note that the North Somerset Landscape Sensitivity Assessment (March 2018) finds all land around the edge of Nailsea is relatively sensitive in landscape terms, apart from some sports fields which are well contained immediately to the south of Nailsea and hence not available for development. In addition, all Nailsea options are</p>	28475 A5 LKT jmm 181210 SW Nailsea complete reps.pdf (1.1 MB)

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>greenfield sites and hence perform poorly in the appraisal against re-using previously developed land. And finally, land to the north, south and west comprise best and most versatile agricultural land (the east is unknown) and therefore, again, there is very little difference in the performance against the agricultural land SA objective.</p> <p>We also note that Green Belt surrounds Nailsea to the north, east and south-east of the town. Therefore, another significant advantage of south west Nailsea is that it is not in the Green Belt.</p> <p>This shows that overall, given the number of positive relationships with SA objectives, and comparative performance against other strategic options in Nailsea, South West Nailsea is a sustainable location for the growth of the town.</p> <p>Further details are contained within the attachment</p>	
BD161		<p>I notice in the proposals for improved road links on the above plan, that roads W4 and W5 are to be used to handle increased traffic flow from Nailsea to/from Clevedon Jct20 M5. I would suggest that this is totally impractical as Clevedon Road through Tickenham village is and always will be totally unsuitable for any heavy use as the underlying foundation of this road cannot sustain this proposal. An inspection if carried out would I believe show this to be true. The roadway past Tickenham School is not wide enough to allow an adequate footpath width for schoolchildren and parents. The road is already collapsing in large areas on the northern edge between the village hall and Washing Pound Lane, this after a full resurface within the last few years. This roadway was never designed to handle the weight of HGVs currently allowed under government legislation. The laughable estimate of an extra 300 journeys daily each way after the expansion of Nailsea/Backwell is totally false and is likely to be at least doubled. The increase of use by HGVs to reach the existing and any proposed extension of employment related areas will further degrade the road structure and increase dangers to pedestrians. Clevedon Road has large lengths of road where either no footpath exists at all, has a footpath on one side only, or has a footpath too narrow to be of safe use. This proposal is ill thought, further degrades the air quality in the village of Tickenham and is positively dangerous for residents, road users and pedestrians alike. Clevedon Road is also used by the emergency services based in Nailsea and increases in traffic will further degrade their ability to negotiate the route safely. THE ONLY OPTION IS TO ACTUALLY BITE THE BULLET AND CREATE A NEW ROAD TO LINK NAILSEA/BACKWELL TO M5 JCT20 as was the original plan when Nailsea first expanded.</p>	
BHFP		<p>Overall I support the development and agree Nailsea needs growth. Good to make use of the railway links.</p>	
BHFP		<p>Reading though your document Local Plan 2036 for North Somerset I would like to comment particularly on protecting Greenbelt north east of Nailsea.</p> <p>There are absolutely no reasons that this beautiful area of greenbelt should be considered for release and I would encourage you not to allow any kind of development. This is vital green space that is needed by residents and visitors. The valley is so important and would be a huge loss to the community. There are many benefits to having greenbelt here, people's mental health being just one of them, the diversity of wildlife and their habits being another.</p> <p>We need to protect areas such as this for our children to play and grow. Get them off screens and away from the telly, get them outside exploring nature, climbing trees, paddling in the river. Where can we let them do this if our greenbelt is taken away and they are left with concrete and tarmac. Children need these vital green spaces to grow, develop and learn. They need them for their physical and mental well being.</p> <p>The fields flood on a regular basis so definitely not suitable for development as that would just make the flooding worse.</p> <p>The traffic implications either end of the valley in Wraxall and Tickenham are huge not to mention the potential for pollution of the River Yeo which feeds into a SSSI.</p> <p>I ask that you consider all these things and many more and you will save our Greenbelt and not be pressured by those that just want to make money with no thought or care to the people that live in this beautiful valley. I have always considered, having moved from Chew Valley which is an ANOB, that our valley is equally as stunning and should be protected.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
BJ Allsop		<p>I do not think the alternatives have been sufficiently explored. I do not agree with the principles and would like comments A and B to be considered.</p> <p>A. I note that all the proposed solutions to the Backwell situation as well as that of the villages along the A370 and even along the A38 (due to the new Bristol South Link) depend on crossing the River Avon at the Cumberland Basin. Even the proposed new road traffic routes merely move traffic congestion away from such current choke points as the Station Road/A38 traffic lights to the A370 closer to Bristol and will result in major traffic chaos from the Cumberland Basin back down the A370 (and A38) towards Backwell (or towards WSM in the worst case). There is basically no solution to this traffic congestion without a major re-routing of traffic within Bristol so as to reduce the traffic load on the Cumberland Basin. The tinkering with the "Transport Hub" to enable cyclists and pedestrians easier access to the station will not materially change the traffic congestion problem. In fact due to the railway line having to accommodate express trains, the options for laying on further trains to accommodate the new builds is less than it may appear at first. Finally the Metrobus is looked upon as the universal solution to Bristol traffic problems but is completely unproven especially for lengthy trips such as Backwell to Bristol. It might require an awful lot of Metrobuses.</p> <p>I have lived in the Los Angeles area for many years and the development of huge flyovers and high speed roads could solve this problem by enabling the heavy traffic coming in over the Cumberland Basin to "fan out" to the various areas of Bristol. However the cost would be huge and Bristol would be forever changed. It would probably need a high level motorway bridge over the Avon Gorge.</p> <p>B. There is a requirement to build new roads in the Backwell Common Green Belt which would essentially destroy this wonderful ribbon of peace and tranquility between Backwell and Nailsea. The peaceful tranquility with grazing cattle and babbling brooks which is one of the major rewards of living in the Backwell/Nailsea area would be lost for ever. More than 15,000 people live within ten miles of this Green Belt and enjoy this amenity. What is especially perplexing is why the North Somerset Council would not survey the possibility of moving much of the proposed development to The Vale, apparently on the grounds that it is also Green Belt. My suggestion is that a review of the relative viability of the Backwell Common Green Belt vs the Vale Green Belt be undertaken. On the face of it The Vale Green Belt is much more suited for large scale development as it would reduce the distances needed to be travelled to access Bristol by 90% with corresponding reductions in pollution and fuel use. Many much cheaper routes could be constructed with many small crossings of the Avon and cause the traffic to fan out over Bristol and the use of Metrobus would be much more effective due to the shorter distances as would pedestrian and cycle traffic. What makes one Green Belt subject to destruction while keeping another neighbouring one which is not enjoyed by as large a population? Surely it is reasonable to review this situation.</p>	
Blagdon PC	Blagdon Parish Council	<p>We support the vision but remain sceptical about the ability to deliver it in a timely and economic fashion.</p> <p>We have yet to see any proposals regarding timescales or phasing.</p> <p>We are concerned about the level and duration of upheaval that will be created over the development period, particularly if road and transport infrastructure is not prioritised over housing and business development.</p>	
Cliff Barker	Mr	<p>If access roads are needed around Nailsea, I see logic in the principle of building a link from the south of M5 J21 at Clevedon, passing the West side of Nailsea and intersecting the A370 West of Backwell. There could be an extension to this road continuing on to the A38 in the vicinity of Lulsgate, thus giving a more direct route from the M5 to the airport. Development of Nailsea could then be argued using the road as a new Western settlement boundary.</p>	
Diane		<p>I do not support the vision that expansion will be focused on the South West of Nailsea. I support developing a number of new sites around the North and West peripheries of the existing town. This will maximise utilisation of the existing town centre, facilitate the improvement of existing transport infrastructure, for metrobus and private vehicle, serving the development sites to the West and North West of Nailsea already allocated within the local plan to 2026 and the industrial areas to the West and North of Nailsea, as well as the new developments to 2036, and deflect traffic from the Nailsea developments away from the congested centre of Backwell, avoiding the massive infrastructure complexity, cost and lead time to deliver a new link road. It will also maintain the separate identity and character of Nailsea and Backwell by avoiding the construction of a major link road in the strategic gap and green belt between the settlements.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		I do not understand the reference to providing some higher density development close to the railway station. I assume this must be a drafting error, as no development is proposed in Nailsea close to the railway station.	
Dovecote		<p>The place to locate new housing is near existing and proposed transport hubs—and Nailsea has those to the south west</p> <p>This should go hand in hand with suburban centres allowing access to local retail, services and amenities without reliance on road traffic</p> <p>Because of its strategic location, the area to the south west lends itself to economic development—its proximity to transport hubs will make it attractive to new businesses and startups, proving local employment opportunities</p>	
Ecomotive Ltd		As above, we consider that community-led delivery and ownership should form a key component of any new development in Nailsea and should therefore be included within the core principles set out for the area.	
F Parry		The combined impact on the local area of the Nailsea development alongside the proposed Backwell development would place an impossible strain on the area's transportation links and public transport networks (train and bus). It could be argued that Nailsea as a town is better equipped with services and amenities to support large scale additions than Backwell would be, but again I would suggest that numerous smaller developments would be integrated far better than one mammoth development of over 2.5k homes!	
Flax Bourton Parish Council	Flax Bourton PC	<ul style="list-style-type: none"> • The consultation acknowledges that Nailsea population has fallen in recent years so on what basis is it reasonable to assume that there will be the need for a further 2575 residential units? • Strong consideration should be given to the proposed new link to the B3130 at Clevedon Road, Tickenham (W4) leading to the B3128. This link to Bristol for both Nailsea and Backwell would avoid taking increased traffic volumes through existing villages and is probably a less expensive option than trying to funnel additional traffic onto the A370. • Development to the South West of Nailsea encourages dormitory living. Development should be closer to the town centre on the North West of Nailsea. • Flax Bourton Parish Council believes the timing of the Local Plan – Issues and Options Consultation is premature given the Joint Spatial Plan (JSP) is still at a very early stage of development. It does not believe it is possible to move to the next stage until the JSP has been tested in a public forum in May 2019 and the Joint Transport Plan 4 is available for consideration in early 2019. In addition, the BRSWEL Study, the output of which is believed to be important, has not yet been made available. Also there is no study/report of railway capacity from Railtrack or train operating companies. • Flax Bourton Parish Council objects to the Strategic Development Locations proposed in Nailsea and Backwell on the basis of soundness as they are unsustainable, undeliverable and in breach of national planning guidelines, particularly NPPF 11, 35, 102, 103 and 109, evidence for which is set out in our answers to questions to 19, 20 and 23. • These locations have not been chosen to generate local employment opportunities. They assume the need for more outward commuting to Bristol. This has been confirmed at the meetings in Backwell and Nailsea to discuss the Local Plan with North Somerset's planners. Also document WED006 Updated Employment Evidence confirms. • There is no assessment of the impact of further development including road infrastructure on the built environment – listed, heritage buildings etc. i.e. there are 12 listed buildings in the village of Flax Bourton, 7 on the main road (A370). 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • E3 and rephasing of Backwell traffic lights funnels all traffic from the Nailsea and Backwell SDLs currently totalling 2,900 houses in addition to the existing traffic and any additional traffic from the other SDLs through Flax Bourton which is split by the A370 which is the narrowest, slowest section of the A370 with blind bends, pedestrian pavement on only one side and then only single person width, 7 listed buildings fronting the road, concealed driveways, 5 road junctions, access to a children's nursery, primary school, working aggregates quarry and asphalt plant. • The proposed E3 road link will increase traffic causing an unacceptable impact on highway safety see NPPF 109. • The cumulative effect of the E3 and other proposed traffic mitigation works through Flax Bourton will be severe see NPPF 109. • Moving traffic from Backwell traffic lights to Farleigh/Flax Bourton merely moves the problem at huge expense. It will not mitigate or reduce traffic. Existing traffic on the A370 is at capacity and the additional traffic from Nailsea and Backwell SDLs will exceed capacity. Not only will junction capacity be exceeded but also link capacity which will lead to flow breakdown. • For the reasons stated above E3 and other traffic mitigation will have a negative impact on commuting times and economic activity. • We will respond to the Transport Topic Paper 8 WED 007 and Emerging Findings Transport Report WED 008 in detail in the JSP consultation process. We do, however, comment now that these documents are flawed and do not give a plausible or credible basis to the transport proposals in this draft Local Plan. Transport Modelling is unsound, for example, it has failed to take account of the South Bristol Link Road in transferring congestion from Barrow Gurney to the A370. Also Figure 3.6 of Transport Topic Paper 8 (WED007) shows AM peak forecast traffic flow differences without mitigation and predicts surprising results, for example, A370 SW Brockley traffic lights increase of 300-600 PCU (from the SDLs of Banwell & Churchill) but traffic then disappears. Where does it go? Topic Papers show a peak hour increase of 600 vehicles through Flax Bourton. Up to date figures from a NSC assessment in November 2018 show that this represents a 60% increase in peak hour traffic which is unsustainable. • Assessment evidence should be shown that the A370 and the proposed E3 link is the only deliverable option for linking Nailsea and Backwell to Bristol. • We support E6 of the transport scheme as it will improve bus access to Bristol on the Long Ashton bypass which has become increasingly congested since the opening of the South Bristol Link Road. • As stated in reply to Question 3 the absence of Joint Transport Plan 4, BRSWEL Study and any study or report from Railtrack or Train Operating Companies prevents any reasonable discussion for the determination of the locations of SDLs and the transport serving them and therefore whether they are sustainable. This plan is unsound. 	
G Mitchell		<p>I have been a resident of Nailsea for the past twenty years and have seen many changes to the area and local community, some not for the better but nevertheless I have acknowledged is necessary and appreciated that some plans have to be implemented to meet demand.</p> <p>However, where this plan is concerned I am somewhat confounded by the plan and the scant regard given to the potential impact to the community, its people and the environment. I live in Sunnymede Road Nailsea and any development will have a direct adverse impact on me and my family, will create a considerable number of physical, environmental and infrastructural issues and as a consequence will cause me to consider whether I wish to remain in this area</p> <p>My objections to this proposed development are as follows</p> <ul style="list-style-type: none"> • the valley is , I believe, designated as green belt and such holds a wealth of wildlife and wildlife habitat. As a dog walker, I regularly use this space for exercise and to remove this facility would have a detrimental impact on my personal life. • I have not been convinced that there any special circumstances to support the release of Green belt to accommodate this plan. It is important to have green space around the town which people may access to a beautiful countryside • The main Tickenham/Clevedon road is already impacted through large volumes of traffic, HGV sizes are increasing as Logistics companies service local shops and businesses. I have grave concerns that the transport infrastructure will not be able to cope with increased traffic both pre and post development . There would be increased pressure on the existing road system which is already struggling • Views have been expressed by Nailsea Town council regarding the local transport network but I am of the opinion that there will be an increase in commuting to Bristol, that there is insufficient capacity on the rail network to accommodate additional passengers or capacity for parking at the station (there could be a consequential increase in parking in residential areas of Backwell) 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		I have considerable concerns that there are existing constraints on local authority budgets and as a consequence, services to the community are being impacted. It beggars belief that additional funding will materialise to support services required by the increase population . In addition, the view that the development will encourage more cultural and leisure facilities is just pie in the sky, this being substantiated by other 'developments' in Bristol which have resulted in residents being up in arms regarding the promise of facilities in their locale not being provided years after completion.	
G Thomas		Comments relating to housing should be in Ashton Vale and the road should be constructed north of Nailsea	Geoffrey Thomas.pdf (212 KB)
J Howard		With regard to the Proposed vision this seems highly sensible and in the best interests of the future of the town in order that it can be more self sustaining, much more sustainable and balanced as a community, create opportunities for young and old in terms of housing and jobs, as well as ensure it benefits from having closer links to Bristol by utilising its convenient access to the railway station, which is a key asset and is currently under exploited by constraints placed on development to the south of the town and west of station road. The outlined principles seem sound. The revision of the retained gap is essential to provide a long term solution that is fully cognisant of the natural gap created by the flood plain and the physical gap created by the railway line. This will ensure Nailsea can realise its potential and secure the strategic gap in perpetuity.	
J Parkinson		See attachment.	THE LAND YEO VALLEY IN NAILSEA.docx (8.9 MB)
J Smallbone		<p>Nailsea Town Council have included in their Vision for Nailsea that current Green Belt land be reviewed and are in favour of loss of this land to the north of the town. Emphasis has been placed on protecting the strategic gap between Nailsea and Backwell but no consideration has been given to keeping the boundaries between Nailsea and Wraxall or Tickenham. They are in favour of accepting a speculative plan by the Land Value Alliance including up to 600 houses, commercial buildings and a new road connecting the B3130 from Jacklands to Wraxall House, all on Green Belt land with a steep gradient and the Land Yeo river running at the lowest point, which is a floodplain. The LVA plan includes no health care facilities or schools and the proposed new road would connect two stretches of 'B' road which are already full to capacity during peak travel times. NTC admit that most residents of any new housing in Nailsea would have to travel out of town to work. Building closer to the Railway Station would therefore seem more sustainable as passengers would be able to walk to the station.</p> <p>Green Belt land exists to prevent urban sprawl and to separate towns and villages from each other, preserving the unique character of each. It provides a place for people to walk and relax, improving physical and mental health and wellbeing and also provides vital wildlife corridors, linking habitat and populations so that species do not become isolated and so under increased threat of decline. Once Green Belt land is built on it is lost to us and future generations.</p> <p>At present the Green Belt to the north of Nailsea includes a network of footpaths, well used by individuals, walking groups, families and dog walkers. To the east, near Wraxall, is the site of a Roman villa. Adjacent is Tower House Wood, under care of the Woodland Trust, providing habitat for flora and fauna and recreation space for people. The area is populated by a variety of wild life species including bats, owls, raptors, little egrets and protected mammals. Jacklands Fishing Lakes provide recreation and education, teaching people including school children and those with disabilities how to fish. Having recently received a grant to improve facilities from West of England Rural Development/LEADER fund this small rural business would be under threat from encroaching development.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>There is no overriding precedent to change this Green Belt land status. Nailsea Town Council would gain a one-off payment from the developer but would lose a local amenity for ever, and Tickenham, Nailsea and Wraxall would effectively be joined together, creating the opportunity for further urban sprawl. The risk of flooding and pollution of the river would increase, wildlife would be under pressure and the general landscape would be degraded.</p> <p>Wherever new housing is built in North Somerset there is no point in putting it where there is no scope to build infrastructure and where people have to commute to find work, that is just not sustainable at present and will become less so in the future.</p>	
JemB		<p>Timing is everything.</p> <p>The proposed development at Backwell would appear to destroy the character of the town and add to traffic that will already be high. Furthermore it will create a demand for secondary school places that cannot be sensibly resolved at this time. The school is large and full. There will be a deficit in places arising from rising demand from villages because Chew Valley is now full.</p> <p>Focus all new developments of size in one area to minimise problems with infrastructure so this site should not be commenced until a very large proportion of the houses in Nailsea are built and the A370 remodelled and the expansion of Nailsea School is well under way so that a second campus to one or the other could be built.</p> <p>The national birth rate is currently not at a sustainable level. It would be wise to focus all of the development in one place, Nailsea, rather than have multiple failing sites due to substantial drops in demand.</p> <p>One suspects that by the late 2030s the site will not be required, so if you have</p>	
JemB		<p>Nailsea has extensive protected otter groups to the north of the town.</p> <p>There is a need for dedicated social housing scattered through the town. These should include proportions of houses for families. Fixed housing percentages for social / affordable/ subsidised housing need careful examination, a need to from end high percentage loading. (i.e. more than 30% now)</p> <p>The A370 should be built as close as possible to the main railway line.</p> <p>Nailsea has significant inward migration of older people due to the absence of doctors' surgeries and shops. There is no quality hotel accommodation so these people and residents tend to keep larger homes to accommodate visiting families and as security in times of financial uncertainty, they can always get equity release finance. It would be better to subsidise provision of retail and other facilities in villages like Winford and Tickenham.</p> <p>Cycle routes should be separate from roads, along the Dutch model with services running under the cycle paths not roads. Extensive use should be made of cobbles/ bricks on roads to reduce speeds. These can be laid using modern technologies very swiftly.</p> <p>Centralised estate automatic waste collection to avoid the need for refuse trucks to visit houses.</p> <p>A second deck, using steel construction for lightness should be considered for Station Road Car Park.</p> <p>All new homes should have solar tiles to generate electricity with existing obsolete warehouses used to provide battery storage (as planned in Swindon and elsewhere).</p> <p>NB The average age of mothers means a family with young children will be much older than public perception</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
John Miners		The number of houses to be built must reflect the need for housing: a figure of 2,575 determined by a remote body has no meaningful validity. Nailsea is a rural town and should stay that way: it must remain a place where people wish to live!	
K Stradling		<p>I am writing to express my concerns with regards to the proposed removal of the Greenbelt status of the Valley in Nailsea, and the building of houses on this land.</p> <p>This land is one of the very few remaining areas of green space that remains, as it is rapidly being swallowed up by concrete, bricks and Tarmac. It is vitally important that this Greenbelt remains on this land, to protect it, the wildlife and the Eco systems it supports, and the human population as well.</p> <p>I have lived here in the same house in Nailsea all 43 years of my life. During that time Nailsea has changed from a village to a town, and is continuing to expand, joining us up with with surrounding towns! As children huge amounts of our time was spent investigating and playing in the fields, woodland, and river that flows through through it! There is an amazing amount of wildlife species that live within this land and are supported by this vitally important ecosystem. The river has a significant fall over its length to the river Yeo, and also is a huge asset considering the vulnerability of this land to flooding. The ground is extremely wet and even the fields that are at highest level flood, to the extent that wildfowl are often seen swimming along the hedge line in the large bodies of water that form. This river supports a multitude of both animals, birds and plant species, some of which are protected and / or rare, such as the Otters, Kingfishers, etc. The river also provides a habitat for a large amount of insect life, which in turn provides a food source for things such as the Horse shoe bats, amphibians including newts, reptiles including snakes and the legless lizards slow worms, The Fish that live in the river, and of course then birds that rely on these fish, insects and the creatures that live on those insects, such as Buzzards, Perigrine Falcons, Kingfishers, to name but a few. Although this land is itself not a SSSI Site of Special Scientific Interest, it is surrounded by areas that are, and this land provides a green corridor to link these areas together and bridge the gap between the concrete cities that are developing all around us!</p> <p>There is no exceptional circumstances that would support the release of this Greenbelt, and is a contributing Greenbelt according to the Greenbelt assessment in joint Spacial plan. This indicates how important this piece of land is. Every night we have Hedgehogs, Badgers, and Foxes visiting our garden, that come from accross the field to our gardens in part to feed. If this land is taken to build on, their home and habitat will be gone so will be pushed further into the concrete world which they are not designed to live in, and so the already endangered Hedgehogs, of whom there are desperately few left, will likely also become extinct in this area too. This would be so very sad.</p> <p>Nailsea and the surrounding areas have more than enough industrial areas. The infrastructure does not exist to support the building of houses and or industrial areas, there are inadequate roads, schools, Drs, shops, drainage systems etc. The pollution levels would rise significantly, both air and water could be affected by vehicle pollutants, and if pollutants reached the river or other water sources it could be devastating for not only the wildlife there, but also further along the river Yeo. The traffic increase in and and out of the valley would make the roads far more dangerous for pedestrians, children, cyclists and the elderly, and the roads are not an adequate size or condition to support this increase. Nailsea does not have the employment opportunities to support an increase in population and it would make more sense to spend the money on building houses where the work is.</p> <p>There had been a huge increase in the mental health issues of people in this country, and by taking green spaces away that have been proven to be of benefit in the recovery and maintaince of people's mental health would be a very poor choice.</p> <p>Another consideration should be that current homes would be devalued by development of this land, as people pay for views, living in the country etc, if that is gone, do has the value of these properties.</p> <p>All this being said, I hope that it realised what a hugely important piece of Greenbelt land that this is, and why it needs to remain so.</p>	
Kit Stokes	StokesMorgan Planning Ltd	<p>Object for following reasons</p> <p>Impact on Special Area of Conservation</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>This is the wrong location. The area is sensitive from a landscape perspective as well as being a critical feeding ground for GHSB and LSHB. Refer to NSC Ecology Officer and NSC North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document (SPD) which identifies that development of key habitat (i.e. bat hunting areas (pasture land)) should be avoided because it cannot be adequately mitigated against.</p> <p>The North Somerset SPD sets out strong requirements for consultation, survey information and appropriate mitigation, to demonstrate that development proposals will not adversely impact on the designated bat populations. This has not been carried out and it is not possible to determine if appropriate mitigation is possible, and whether large scale developments on key habitats for Greater Horseshoe bats and Lesser Horseshoe bats (hunting habitat such as grazed pasture, hedgerows, woodland edges, tree lines, hay meadows and Connecting habitat, which is important to ensure continued functionality of commuting habitats) can be appropriately mitigated.</p> <p>The SPD indicates that such development is unlikely to be acceptable because appropriate mitigation cannot be achieved. For example, providing dark corridors for connective habitat will still fundamentally cause harm through the removal of grazing land which generates the prey on which GHSB are reliant.</p> <p>Landscapes around the SAC itself are a significant a constraint to development. The SDL areas at Banwell, Churchill, Nailsea and Backwell are identified by the Council in its SPD as providing important foraging habitat needed to maintain the favourable conservation status of the horseshoe bats, yet in these areas several thousand houses are proposed.</p> <p>The North Somerset Council Bat SPD identifies that the populations of bats from the North Somerset and Mendips SAC are currently under particular stress from a number of factors, particularly the number of development applications and proposals on the urban edges of Yatton, Congresbury, Nailsea and Cheddar. The SPD also explains that it is the local planning authority's responsibility to ensure that the 'favourable conservation status' (FCS) of local populations of bats is maintained.</p> <p>Before granting planning permission to a development the local authority needs to ensure that the proposed development is not detrimental to the affected population of Greater and Lesser Horseshoe bats' FCS, i.e. that there are no adverse effects on the habitat to support and hence abundance of the local population from the proposed development.</p> <p>Impact on Sensitive Landscape</p> <p>The landscape of Ashton Vale (landfill and municipal golf course next to Bypass) is far less sensitive than the landscape between Morgans Hill, Nailsea and Chelvey.</p> <p>Transport</p> <p>The proposal indicates that a link road will form between Hanham Road (The Causeway) and the B3130 (Tickenham). Has anyone driven across this road (which passes through the Moors SSSI)? Its a single carriageway road which has to squeeze past Tickenham Church. There is a serious lack of joined up thinking which runs throughout these ideas.</p> <p>Nailsea Town Council</p> <p>The position of the town council should be respected.</p>	
Long Ashton Parish Council	Long Ashton Parish Council	<p>Agree with overall concept. Development of Nailsea could provide a local hub for commerce and employment, as an alternative destination to Bristol. As in Q20 the impact of the development on surrounding settlements needs to be considered and mitigated as necessary.</p>	
M Bird		<p>The most practical area for housing in Nailsea is around the northern edge which is</p> <ul style="list-style-type: none"> • closer to the town centre 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • closer to and would help to open up the commercial side of the town • give opportunities to enhance road infrastructure there <p>The proposed site is very isolated, will encourage more traffic through the town on unsuitable roads, add further traffic on Station Road, far from the town centre.</p> <p>See attached document for details.</p>	
M Hayman	.	We support the idea for the expansion of Nailsea to the South West with it links to the railway and an improved road network system for the area. We do have reservations about the impact on Flax Bourton and Cleeve on the A 370 as this will create bottle necks in those areas and may not in reality enable the road and rail improvements to be delivered.	
Margo		<p>Tickenham cannot withstand any more traffic through the village. Besides the current number of passenger vehicles travelling along this route there are 'more than several' commercial vehicles using this route. Commercial vehicles is NOT mentioned in this document but it is an important factor on the volume of traffic travelling through the village. The B3130 is too narrow in many places especially between the junction of Tickenham Hill and Jacklands. On this stretch of road it is extremely difficult for passenger vehicles to pass buses and commercial vehicles let alone commercial vehicles passing each other. This part of the proposed route would increase the possibility of accidents between commercial vehicles, buses and passenger vehicles. Pedestrians who try to walk along this route take their life in their hands as this route has very narrow bends and is steep. In Tickenham there are several places which do not have footpaths and this makes it more dangerous for pedestrians to walk along as vehicles drive too close to the edge of the road. Also, the inhabitants of properties which are just a few feet from the main road find it difficult to move onto Clevedon Road when there is much traffic passing by. For safety many of these inhabitants finding it safer to go with the flow of traffic and then turn round further along the road rather than try to turn across the flow of the traffic.</p> <p>Another form of traffic which is not mentioned in this document is farm vehicles which, by their nature, are very slow. This results in the current level of traffic, passenger or otherwise, are forced to slow down. If more passenger, or other vehicles, then more vehicles would be affected.</p> <p>Yet another problem would be the amount, and width, of construction vehicles driving along the same very narrow road. Again the road between Tickenham Hill and Jacklands would be impassable and there would a reduction of air quality for the inhabitants of the village.</p> <p>On the B3130, through Tickenham, there have been many accidents with the current amount of traffic. Any more traffic being passenger or otherwise would be detrimental to the safety of its' inhabitants. It would make much more sense if a route was constructed from Nailsea to Clevedon and to Junction 20 of the M5 across farmland to the south of Tickenham.</p>	
Mark Funnell, Planning Adviser, National Trust	National Trust	Our comments on the West of England Joint Spatial Plan publication document in January 2018 remain relevant, and included the following: "We are very concerned about the proposal for a new road link between the A370 Long Ashton bypass and the M5 motorway, which is stated as being 'critical infrastructure' for the new housing being proposed at Nailsea and Backwell. We question the appropriateness of these proposals and their sustainability given the reliance on new road infrastructure, which would also	

Respondent Name	Respondent Organisation	Comment	Attached documents
		cause considerable harm within the Green Belt and to designated heritage assets". Those concerns continue to apply in respect of the scale and implications of proposed development at Nailsea and Backwell.	
Mr and Mrs Crooks		In response to question 23 (Nailsea vision): - Here again the importance of maintaining a 'strategic gap' between Nailsea and Backwell is emphasised to protect the separate identities of the settlements. However, given that at its narrowest point, the gap currently consists of a single field, we do not see how this can be maintained with the plan to build a significant road over this field, as well as any future expansion of the station car park or 'transport hub'.	
N Cooper	Claverham Future	You should work with Nailsea Council's proposals for expansion.	
Nailsea Action Group	Nailsea Action Group	Rail capacity at Nailsea for commuters has been significantly reduced by the introduction of new trains. The impact of growth in Weston and other areas will further impact train capacity.	
Nailsea Town Council	Nailsea Town Council	NTC acknowledges the need for housing. The proposed development should not be focussed on the south west as this would be detrimental to the existing town centre and be too far from services and facilities. The proposal to wrap development around the existing settlement boundary, with particular emphasis on developing the north of the town is more sustainable and supports the existing town centre and commercial/economic development of the town. Housing development to the north of the town should include a countryside park running along the Land Yeo, as part of a network of public open space.	
Nailsea Town Council	Nailsea Town Council	The emerging Vision for Nailsea is an integral part of the planning process.	
Nailsea Unit Trust (c/o Ellandi LLP)	Williams Gallagher	The vision should include an aspiration to enhance the town centre offer and therefore identify that some higher density development will be appropriate close to existing and new services / facilities and the rail station. Nailsea town centre will need to evolve over the lifetime of the plan therefore explicit reference should be made within the plan that evolution, enhancement and repurposing of Nailsea town centre to include increasing density of town centre uses (for example retail, leisure, residential offices etc.) will be encouraged and supported.	
P Roberts		I Object to the North Somerset Local Plan for the following reasons: 1. In general no consideration has been given to the effects of this plan on the residents of Tickenham and West End 2. The road marked W4 on Plan A will create an enormous increase in traffic through Tickenham, a village which is already heavily congested. The figures suggested for the likely increase in traffic and the current use have to be regarded with suspicion - when were these figures collected? I suspect 8am on a Sunday morning. 3. The road runs past Tickenham Primary School and would cause an increased risk to the children going to and from school. Many children come from outside the area and therefore arrive by car - the designated car park is at the Village Hall on the opposite side of the road and several hundred yards away.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ol style="list-style-type: none"> 4. This road has the potential to pass close by Tickenham Church (a Grade 1 listed building) and to separate it from a part of the village. 5. There should be no significant increase in the number of housing units in Nailsea until an adequate road link has been built to the M5 at Junction 20 - Marked yellow - 'Long Term Potential Link' 6. There have been no public meetings in the local area. There was a meeting in Nailsea on Nov 20th which I attended but this was for invitees only. Information was only sent out only 2 days prior and before that I had seen nothing in the local press. Publicity has been minimal, I take the North Somerset Times regularly and have not seen anything about it. 7. The minutes of Tickenham Parish Council for Nov 8th 2018 state that "the consultation was between NSC and Parish Councils - councils were not required to consult residents" The minutes also point out that the Parish Council has no budget for public consultation. 8. Road W4 has been referred to as the Stone Edge Batch By Pass - presumably because people like the sound of by passes. Please note that I live in the area which would be bypassed (a reverse Nimby maybe?) but I still regard the effects of this development and the road network in particular to be ill conceived 	
PJE		<p>I support the existing North Somerset DC proposal for the area and strongly oppose the Nailsea TC proposal to reallocate 600 homes to the North and East of Nailsea. This land is;</p> <ul style="list-style-type: none"> • Green Belt - I support the view of NS Council that Green Belt should be left untouched and there are no circumstances important enough to warrant it being used for housing development • Is a vital green space and of benefit to the local communities • Is an important habitat for wildlife with the River Yeo flowing into an SSSI • archaeologically important <p>The development of this site would;</p> <ul style="list-style-type: none"> • lead to increased flood risks - much of the surrounding land is low lying and/or a flood plain and any development will exacerbate that issue along with • lead to increased traffic congestion at both the Tickenham and Wraxall ends (B3128 and B3130) of any link road going through the site. The road from Long Ashton to Nailsea is poor and would require substantial investment to make it suitable. At the Tickenham end there is a well known bottleneck which again would require substantial investment. We all know that his investment would never be forthcoming. • would increase the congestion from commuter traffic at peak times through Wraxall and Failand and over the Suspension Bridge. These roads (the B3128 and B3130) are already severely congested with traffic from Portishead using the Caswell Hill and Portbury Lane options as alternatives to the A369 which is a bottleneck at peak times. <p>The existing NSDC proposal;</p> <ul style="list-style-type: none"> • puts the houses next to the good transport links of the A370 and the Nailsea & Backwell train station thereby maximising the potential use of public transport as the station can be used by residents and car users can commute to the Park and Ride in Ashton • will be able to take advantage of any further Metrobus extension • both of the above are important as it is a fact that probably in excess of 90% of the new residents will work in and need to commute to Bristol. • puts the development next to good transport infrastructure. Arguably the development should take place next to the South Bristol Link Road where good transport links already exist and would be closer to employment prospects. • would avoid the increased congestion around Wraxall and Failand and over the Suspension Bridge from increased commuter traffic. These roads are already severely congested at peak times as traffic from Portishead utilises the Portbury Lane and Caswell Hill routes. <p>The idea that Nailsea will attract increased commercial investment and job opportunities flies in the face of the existing fact that office space industrial units have been empty for years. All new residents of Nailsea and Backwell will be commuters.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Portishead Town Council	Portishead Town Council	Concern that the highway proposals will exacerbate Portishead's commuting transport issues.	
R M Sellers		<p>We are horrified to find that Nailsea Town Council have suggested making a change to the green belt on the land above.</p> <p>We would be grateful if you would take the following into account.</p> <p>Recent Government directive stated green belt was not up for grabs in the proposed building more houses plans. There is certainly plenty of housing land to the south of Nailsea far more suitable for housing.</p> <p>This valley is;</p> <ol style="list-style-type: none"> 1. An outstanding valued area of natural beauty. 2. Habitat of protected species which include bats and badgers. 3. in a flood area with the land steep running to a fast flowing river. 4. the land forms a natural surround for northern Nailsea and of course Wraxall. There is no sensible for any reason for housing to be built in this area. 5. The land is presently used by local residents for recreational purposes. <p>It must be born in mind if housing were to be built on the land the road from Jacklands Fishing towards Clevedon would require substantial upgrading and widening which would involve compulsory purchase of existing residential houses along the Tickenham Road. Where is the money coming from do that. A new road would totally destroy the Valley.</p>	
R Smith	Walsingham Planning	<p>Overall, LVA do not agree with the proposed vision for Nailsea as they have significant concerns regarding development to the south west. LVA proposes expansion to the North of Nailsea as an alternative vision that is more sustainable, deliverable and better integrated with the existing settlement and community.</p> <p>As set out in the Consultation Document, the JSP identifies locations across the plan area which are proposed to accommodate a strategic scale of growth (defined as 500+ dwellings). These strategic development locations (SDLs) are indicated diagrammatically in the Consultation Document and it is stated that they will lead to detailed allocations in the Local Plan 2036. However, as previously noted these are yet to be tested at examination and LVA have raised serious concerns regarding the deliverability and impact of the SDL's for Nailsea.</p> <p>The proposed vision for Nailsea relies on a large urban extension to the south west of Nailsea which would result in coalescence with Backwell and would locate significant growth in a location that was poorly located to the town centre, would provide little improvement to existing traffic issues at the town and would require significant infrastructure improvements which have yet to be fully explored or costed. The evidence base supporting the JSP does not properly justify why this location has been identified for development over other sustainable options.</p> <p>A Draft Transport Review of the Strategic Development Locations has been prepared by Trace Design attached at Appendix 4. As we will discuss in the following section on Transport, the study highlights a number of serious issues with the deliverability of the transport infrastructure required to facilitate the SDL's and the impact of the SDL's on local road infrastructure.</p> <p>In contrast a strategic and sustainable urban expansion to the North of Nailsea comprising residential, employment, community uses and sports/leisure facilities would assist in meeting the strategic and local housing requirement whilst helping to improve self-containment.</p> <p>The site has good access to the wider road network and also has the potential to deliver a much needed northern link road which would reduce congestion locally and provide a more suitable access for the existing and proposed employment areas. The site has greater accessibility to the town centre and other facilities compared to the SDL's. Importantly it is deliverable as development at the site is not dependent on the early construction of the A370 to Junction 20 of the M5 Link Road.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>As demonstrated by these representations there is no compelling evidence to justify why this land should be retained as Green Belt or kept permanently open. Importantly the release of the Green Belt in this location would not set a precedent for further development elsewhere as there is an obvious natural boundary further north where the land falls away down to the lower lying land and the river. This would create a long term defensible greenbelt boundary. The potential also exists to reallocate the greenbelt to the south of Nailsea in order to protect the more sensitive strategic gap between Backwell and Nailsea.</p> <p>LVA commissioned a Concept Plan of the potential development area which is attached at Appendix 5. This work will require further refinement in due course although as currently illustrated the site could provide a sustainable mixed use development of at least 600 dwellings and 2 hectares of employment land along with strategic green buffers and significant areas of community open space. The site lies adjacent to an area of existing employment providing potential regeneration opportunities. It is also well located to the Town Centre and other facilities including local schools.</p> <p>A request for a screening opinion supported by initial technical studies has been submitted to NS Council. The initial baseline assessment carried out to support the screening request has confirmed that the site has no significant environmental constraints which would prevent development from proceeding.</p> <p>The site is located in Flood Zone 1, is not located in an area identified for any particular archaeological value, is not located with an Area of Outstanding Beauty (AONB) or Special Landscape Area (SLA) and does not provide the potential for any European Protected Species, other than possible bat roosting in oak trees. Furthermore, reasonable and proportionate bat mitigation and enhancement provisions could be made by retaining, managing and enhancing hedges and by enhancing the habitat opportunities provided by the Land Yeo watercourse and the wide strip of low-lying land that adjoins it.</p> <p>Having regard to the alternative scenarios, LVA can see no logical reason why development to the North of Nailsea has not been considered as an alternative option for accommodating strategic growth in Nailsea. Therefore, in response to Q26, LVA propose that expansion to the north of Nailsea is added as an alternative option.</p>	
R Wood		<p>how a figure of 2575 homes is reached for this location is staggering. effects on wildlife in this rural area could be very harmful.</p> <p>The costs to build roads to support the construction will be massive and unsustainable and as with this type of poor judgement homes will inevitably be built without the infrastructure to go with them</p>	
redsquirrel		<p>has anybody looked at the level in the river yeo since the rain ? the river looks higher than the road at jacklands. any building on the land between tickenham and towerhouse lane is going to increase these levels and almost certainly trigger flooding in the valley as there wont be the surface area available to soak up the run off from the existing estates above the river nailsea side.</p>	
Renson		<p>As a long turn resident of Tickenham I have witnessed increasing traffic but always in the hope that there would be a new road south of the village which would link the M5 with Nailsea and beyond.</p> <p>I am dismayed that there has been No Public Meeting in Tickenham on your latest plan the link Nailsea to the M5 via Tickenham. Unlike other areas</p> <p>I do not consider that your estimate of an additional 300 vehicles per day is in anyway accurate considering the numbers of new houses planned.</p> <p>This is Totally Unacceptable And if carried out I believe that the new Strategic Link road through to the M5 will ever be built.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Rocke Associates on behalf of Mactaggart and Mickel Homes Ltd	Rocke Associates	<p>The appropriateness of expansion of Nailsea to the south-west is foreshadowed in the housing allocations in the Site Allocations Plan relating to Land west of Engine Lane and Land at Youngwood Lane. The vision is already given expression through the illustrative masterplan accompanying the application for outline planning permission relating to the allocated site at Youngwood Lane and adjoining land to the south now included in the emerging strategic allocation.</p> <p>If the vision for Nailsea to have expanded to the south-west by 2036 is to be realised by that date, and which is necessary to achieve the enhancements to the mix and type of residential accommodation and rebalancing of the demographic profile that it foreshadows, then it is essential that an appropriate delivery strategy is identified to make this practical and achievable. The delivery trajectory foreshadowed in the JSP for this SDL does not sit comfortably with achieving the vision by 2036, and is unlikely to be achieved unless early phases of development are permitted.</p> <p>For reasons outlined in the representations above, the site north of Youngwood Lane that is allocated in the Site Allocations Plan to accommodate housing needs in the period to 2026 is unlikely to be deliverable without the remainder of the site the subject of the outline planning application. Therefore, absent release of the wider site as an early phase that is capable of delivering housing for occupation in the period to 2026, not only will the emerging strategic vision for Nailsea be at risk, but the history of delivery failures on allocated sites at Nailsea during successive development plan periods will be perpetuated. <i>Ipsos facto</i>, there will be a further delay in delivering housing that is needed now to contribute to re-balancing the town's ageing demographic profile and overall population decline. It therefore will compound the negative historic trends, and the difficulties of reversing them.</p>	
Roger Key		<p>1. Strategic Development Locations</p> <ol style="list-style-type: none"> 1. The I&OD includes four areas for development that are described as Strategic Development Locations (SDLs). Given the forecast population growth in the WoE and in North Somerset, I am not against the proposals for some large development sites, as they can deliver the required infrastructure in terms of local amenities. However, I do object to the proposed sites at Nailsea and Churchill/Mendip Spring. 2. Of the SDLs included in the I&OD, I can see that Banwell and Backwell may have their merits. Banwell is close enough to Weston-super-Mare for new residents to travel to work in Weston by cycling or new public transport services. Meanwhile, Banwell village has long needed a bypass and construction of new houses will contribute to the cost of its construction. (I am not convinced that the additional houses should be located north of the proposed bypass but that matter is for a later stage of plan making. Backwell is well served for non-car travel by train and by regular bus services along the A370. So I can see the case for modest growth of Backwell too. 3. In contrast, I am completely opposed to the proposed SDL of 2675 dwellings with employment land at Churchill/Mendip Spring because the site is simply too isolated and too far from the employment centres of both Bristol and Weston-super-Mare. There is little prospect of providing a frequent bus service to attract travellers away from their cars to these destinations. So residents working in those locations will be forced to travel by car adding to traffic on the routes to the west and north, including both the A370 and the A38. The A38 to the north of Bristol Airport already needs improvement (even before the airport applies to expand its passenger limits). The A370, with several villages straddling the road between Congresbury and Flax Bourton, is not capable of carrying significant growth in traffic without harming those settlements through declining air quality, noise, vibration, severance and an increased risk of accidents. 4. I also have concerns about the allocation of an SDL for 2575 dwellings with employment land, within the Plan period, located to the south-west of Nailsea. Here, I can see that there may be scope for some development but the location appears to me to be on the "wrong side" of Nailsea, as it's too remote from the town centre. It seems to me that it would be better to concentrate development at Nailsea on the north and north-east side, where it would be closer to and easier to integrate with the existing town. Extensive development to the south-west would also concentrate development traffic on the A370. Even with the suggested transport mitigation package, the JSP Transport Topic Paper (Update) WED007 predicts increases of traffic of several hundred vehicles in the AM peak, which is probably beyond the capacity of the existing road. Allocating land to the north and north-east would channel additional traffic onto the B3130, where it would impact on far fewer residents. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
S Hart		<p>I write in response to the Local Plan 2036 for North Somerset. I am extremely concerned about Nailsea Town Council's proposal for North Somerset Council to review the Green Belt on the north side of Nailsea (in Wraxall) for the following reasons:</p> <ol style="list-style-type: none"> 1. North Somerset Council have historically dismissed this site for development so have firm and valid reasons for upholding this, as they have done in the past. 2. This beautiful valley is designated as 'contributing' Green Belt (Green belt Assessment in Joint Spatial Plan) and serves as vital green space between Nailsea and Wraxall. 3. The land is predominantly farmland rich in wildlife and flora. The land is laced with footpaths for local people to enjoy vital green space for leisure and wellbeing. 4. The valley is home to Birdcombe Court Grade 2* listed building, Wraxall Court, Wraxall House and indeed the Tyntesfield and Belmont estates - the curtilage of these historic buildings needs to be preserved in their entirety within the valley. 5. The site has considerable fall over its entire length to the river Yeo and any increased development would clearly cause a flood and pollution risk as this river feeds into an SSSI. 6. This is an archaeologically sensitive area. 7. There is clearly no demand for extra industrial development as some existing commercial premises are being converted into residential housing whilst others remain empty. 8. Any new road through this part of the valley would not improve the significant bottleneck at Jacklands Bridge or through Wraxall village from The Battleaxes to the church where both places are very narrow. 9. Nailsea Town Council's suggestion that development elsewhere around Nailsea would be 'too far' from the commercial centre is absurd. Development would be far better served nearer the train station with a road through to the A370 to serve the largely commuting population and juggernauts. This would vastly reduce the traffic problems noted in point 8 above. <p>In summary, I urge you to reject Nailsea Town Council's suggestions to review the Green Belt status of this area of land.</p>	
S Ible	Terence ORourke	<p>Gleeson generally support this vision, although considers that reference to the 'retained gap' is clarified, given that it is appropriate to review the gap in order to accommodate development. A more appropriate vision would be revised to state that:</p> <p>'the separate identity of Nailsea and Backwell is protected and attractive and convenient walking and cycling routes are provided to the station'.</p>	
SGD30		<p>Broadly in agreement as the plan seems to be taking into account a sustainable future for the town providing a balanced community as well as housing and jobs for young and old. It also makes the most of its proximity to Bristol by providing easy access to the station. It does, however, seem that a new approach to the retained gap which makes the most of the natural gap provided by the flood plain and the railway line would make the plan even more sustainable and beneficial for all Nailsea residents.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Sheena Court		I am totally opposed to the plans for Backwell and Nailsea. Houses should be built near to the jobs in Bristol. Transport infrastructure is environmentally damaging and the cost of creating roads and infrastructure is disproportionate to the benefit of 700 more houses in Backwell. A development of 700 houses in Backwell will totally destroy the village and surrounding area. The proposed transport link will turn the village into a commuter town and only create congestion and pollution as more and more cars join the commute to Bristol. In addition, the area cannot accommodate the 2,500 additional houses in Nailsea. The roads are already congested and you cannot find a parking space at the shopping areas in Nailsea and Backwell.	
SJH2017		Contrary to Nailsea Town Council's proposal to develop the valley on the north side of Nailsea, we believe that any future development should be focussed on areas to the south side, closer to the better road and rail links. Development of the valley to the north of Nailsea would require removing land from green belt, which is undesirable.	
SR		We support the JSP conditional that infrastructure improvements are implemented and aligned with need and a sensitive environmental policy is maintained. To further add, a retained gap "to protect the separate identities of Nailsea and Backwell" is of utmost importance.	
T Brake		<p>I note that North Somerset CC has at this point in time no specific plans to redesignate the Green Belt corridor to the north of Nailsea that runs on the outer edge of the Town between Wraxall and Jacklands Bridge.</p> <p>I would whole heartedly welcome NSCC continued support for this decision for the following reasons;</p> <ul style="list-style-type: none"> • There is an abundance of wildlife in this valley which includes Slow worms, Bats, Otters, Hedgehogs, Dragonflies, Damselfly, Stoat's/Weasels. These are all species which are becoming increasingly rare and this environment provides a haven for them in which to flourish. • The land is often flooded for weeks at a time and the run off would pose a greater risk of flooding. • The narrow roads servicing this end of Nailsea cannot cope with the volume of traffic at current levels. Removal of Greenbelt land and allowed development of such an area will increase traffic significantly. Will that lead to new roads cutting through the beautiful valley of Wraxall in order to join up with the Long Ashton bypass A370 ? • In Nailsea there are other development opportunities and land available without removing Greenbelt status. These are areas adjacent to the main railway line and Nailsea & Backwell station and also fairly close to the A370. • The land and river that sits within the Greenbelt that surrounds the north of Nailsea, is enjoyed and used by a diverse age group of local people on a daily basis. Please continue to support and preserve this outstanding area for future generations. • If this decision is reversed then it will open the floodgate to the potential of all Greenbelt land being developed. 	
The Baker Family		<p>We have amalgamated our comments on questions 23 and 24 since these are inextricably linked. As the Council will be aware our clients have put forward representations in the context of the JSP supporting the proposed SDL at Nailsea and indicating their intention to cooperate with the Council and other key stakeholders to bring forward their land on a comprehensive and coordinated basis. We have of course recently met with the Council's Planning Policy team to have some initial discussions in this respect.</p> <p>Both the proposed vision and the principles for development are broadly supported in principle, although much of the structure and detail for the form and design of the SDL at Nailsea will necessarily be determined by the baseline evidence which has yet to be prepared. Ultimately it will be this evidence which</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		will inform and determine the eventual master plan. However, it could therefore potentially be premature to prescribe in too greater detail matters that have yet to be fully assessed and evaluated.	
The Belmont Estate	Ridge and Partner LLP	<p>As above, we remain concerned regarding the lack of identification regarding the protection and enhancement of heritage assets and their settings in the vicinity of development at Nailsea. We suggest the Vision should be updated to reflect this point accordingly. We suggest the following wording:</p> <p><i>By 2036, Nailsea will have expanded to the southwest, enhancing the mix and type of residential accommodation and balancing the demographic profile. New development will be sensitive to the semi-rural context and provide some higher density development close to new services and facilities and the rail station. Opportunities for new business will be provided and supported with good access to Bristol and Weston-super-Mare including by public transport. A retained gap will be in place to protect the separate identity of Nailsea and Backwell that will accommodate attractive and convenient walking and cycling routes to the station. <u>New development and its associated infrastructure</u> will respect and enhance the setting of designated heritage assets including the setting of nearby <u>Tyntesfield and Belmont Estates</u>.</i></p>	
Tickenham Parish Council	Tickenham PC	<p>Although not part of the current proposals, it is understood from Nailsea Town Council's Vision that there is support in Nailsea for development of land stretching from the Fire Station on Clevedon Road to Wraxall House to the north of existing houses in Nailsea. Preliminary sketches indicate a road from east to west through the suggested development which could be considered as a northern Nailsea Ring Road linking Pound Lane with Wraxall. It has been suggested that the green belt could be maintained by providing green belt land elsewhere. The proposal would seriously damage the environmental riverine regime of this part of the Land Yeo valley which is home to locally rare wildlife and mesolithic archaeology.</p> <p>CONCLUSION</p> <p>Tickenham Parish Council is opposed to development of the green belt land from Clevedon Road, Nailsea, to Wraxall House in the Parish of Wraxall and Failand for dwellings and road infrastructure, particularly because of its value as open space, riverine rare animals' habitat and the mesolithic archaeology of Wraxall and Failand</p>	
Vanessa		<p>Please keep protecting our green space and don't allow review of Green Belt in the valley to the north of Nailsea opposite Tower House Wood. It is an important buffer zone between Nailsea and Wraxall-which is what Green belt was designed to be, and it is nationally under a renewed and growing level of threat. A wide range of leisure activities take place in the Green Belt. These all reflect in some way, the value of a belt of open land to the people in the urban areas the land surrounds. Green Belt policy was established primarily to stop urban sprawl.</p> <p>That area is important recreational space to my friends and family. We have enjoyed walking there through the woods and along the Land Yeo for many years, watching the wildlife and ecology. It is not just a piece of land on a map ripe for development by LVA. Mental health is a big issue at the moment, making areas such as this vitally important to save for current and future generations.</p> <p>Communication Links</p> <p>We know that North Somerset Council, are supporting this area to remain in Green Belt and thank you for doing this. We cannot see why there would be any special circumstances to change that view, especially as the town is to the south, along with Backwell Railway Station and the airport, with Bristol to the east. The access roads either side of that land (B3130), especially at Tickenham Hill and the T junction, are already traffic 'pinch points' where increased volume would make matters worse. A road across the valley here would by-pass the town centre, which needs footfall, and emergency vehicles could get held up from progressing in either direction on the B3130.</p> <p>Loss of Green Belt</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>If a new development is allowed to be built on our small area of Green Belt land, we will all lose vital green space forever, which can never be replaced. There would be pollution to the River Yeo, which leads into an important SSSI and possible hydrological threats to the flood plain which is a wildlife corridor and important habitat. The ancient woodland of Tower House Wood, would become an urban wood, full of rubbish.</p> <p>Public Health</p> <p>Why build houses, extend the industrial estate and create a leisure centre (that people have to pay to attend) when these fields to the North of Nailsea are easily accessible, open, green healthy space and a public amenity, far better for public health, leisure and exercise than urban planning can provide? Coates House on the trading estate, is already being developed into flats due to underuse. No clever urban planning can ever replace our precious Green Belt. Please keep protecting it!</p>	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	<p>The underlying concept appears to be provision of some employment but reliance on good commuting links to Bristol and Weston-super-Mare; this conflicts with the good sustainability principles for housing to be near employment. Hence, it is considered that there is little merit in high density housing near the railway station; flood zones and surface water also constrain development in this area. Whilst improvements in public transport are to be welcomed, the journey times to work places are unlikely to be short. It is considered that commuters are likely to opt for private transport with new development leading to additional traffic on the already stretched local road network.</p> <p>The measures shown in Plan A do not address fundamental traffic infrastructure problems to properly serve the SDL-N. The measures proposed seem to merely move the problem around at certain pinch points. See also our response to Q39.</p>	
Wrighton Parish Council	Wrighton Parish Council	<p>"...balancing the demographic profile" Fine words but what precisely does this mean in reality?</p>	
wwarden		<p>In this case I think it would be best to leave any detailed comment to the residents, business and others with a more direct interest. However, I must say that I find the suggestion of any new road construction through the green space which currently separates Nailsea from Backwell as bizarre. Any new development or other works which might impact on the lake here should not be given further consideration. It would be irresponsible to progress this further.</p> <p>I note the point made in both cases about ecological sensitivity and Greater and Lesser Horseshoe bats. This should be given more priority. It's unfortunate that potential ecological impacts are ignored. There is a reference to Horseshoe bats in relation to the suggested 'garden villages' and other development, yet these vulnerable and protected animals would be at risk from the proposed development, including around the airport site. Bats don't appreciate new built development, new roads and lighting.</p>	

Document Part Name

Q24. Do you agree with the principles set out for Nailsea and would you suggest any changes to these?

Respondent Name	Respondent Organisation	Comment	Attached documents
Avon Wildlife Trust	Avon Wildlife Trust	<p>Whilst we are supportive of the inclusion of the following principle, Its wording is slightly concerning.</p> <p>'Effective mitigation of ecological issues is central to the development to protect and enhance the nearby sensitive wildlife resource.'</p> <p>The mitigation hierarchy states that that one should</p> <p>'Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, compensate for losses that cannot be avoided.'</p> <p>By committing to effective mitigation it feels that North Somerset Council are implicitly admitting that the proposals for development and associated infrastructure at Nailsea</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>will have significant negative ecological effects particularly with regard to the Bat SAC nearby. If this is the case then surely the time has come to recognise this.</p> <p>The transport scheme required to support the development in Nailsea is primarily based on building new roads in very ecologically sensitive areas. The land take required for these new roads has the potential to destroy ecological rich habitat in the North Somerset Levels and Moors which provides 3% of the remaining wetland habitat in the UK. These new roads also have the potential to cause significant severance of greater and lesser horseshoe bat commuting routes. These routes are particularly sensitive in this location due to their proximity to major summer maternity roosts which are designated as Special Areas of Conservation.</p> <p>All development proposed in the Local Plan must be compliant with North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document.</p> <p>Many of the waterbodies in North Somerset are failing to achieve the environmental targets set for them in the Water Framework Directive. It is vital that any new development does not have an adverse impact on the surrounding waterbodies WFD status.</p>	
Backwell Parish Council	Backwell Parish Council	<p>BPC supports Nailsea Town Council in its efforts to prepare a Town Vision to shape the future growth of the town. BPC is concerned by the south-western expansion of Nailsea to accommodate strategic growth and impact of new transport infrastructure to serve the new development upon the strategic gap and the Backwell community. Development to the north of Nailsea seems a better solution.</p> <p>BPC's comments on the development principles reflect those set out above in respect of the Nailsea and Backwell Transport Schemes.</p>	
BHFP		<p>I agree with the principles set out for the south of Nailsea making use of the railway. I would like to see a limit to development and to maintain countryside surrounding Nailsea. I strongly object to the vision of Nailsea Town Council to take land out of greenbelt to the north and development all the way round Nailsea.</p>	
Blagdon PC	Blagdon Parish Council	<p>We support the principles but remain concerned about the authority's ability to deliver these.</p>	
C Brabner-Evans	Woodland Trust	<p>The Woodland Trust has particular concerns about the potential impact on Towerhouse Wood from the proposals for development around Nailsea set out in the Issues and Options consultation.</p> <p>The close proximity of a large residential development to Towerhouse Wood could have numerous adverse impacts on the health of the site. Currently the valley acts as a protective buffer and area of undeveloped and natural habitat adjacent to Towerhouse woods. By replacing this natural area with a residential development there will be a dramatic change in the intensity of the land use. This will expose Towerhouse woods to a variety of outside influence also known as 'edge effects, which may impact negatively on the site. It is likely that there will also be a significant recreational impact from increased visitor numbers should the development go ahead.</p>	
D J Smith		<p>I have followed with interest over a considerable period of time the stance taken by North Somerset Council with regard to areas of green belt and fully support, at this time, the retention of such areas as they currently stand.</p> <p>I note with unease the suggestion by Nailsea Town Council that a review of the green belt to the north of the town be undertaken with a view to developing this area for both housing and industrial use. I am of the opinion that any review of the green belt which concludes that such land can be re-designated whilst land not currently green belt is available for such development is inherently wrong.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Though I would prefer that the need for the current JSP proposals were not necessary, as a realist they appear to offer the best option for the town. The proposal for the creation of a transport hub and its location centred on the railway station is ideal to serve both the existing town and the proposed housing developments to the west.</p> <p>David J Smith</p> <p>Nailsea</p>	
Deleted User		<p>Having reviewed this document , I can confirm my agreement with its basic principles but am surprised that, despite earlier comments identifying the problems for those planning to provide new housing to meet the JSP targets and ensure a reasonable proportion of new housing will be affordable and environmentally and economically acceptable, the previously proposed "strategic gap "to the south of Nailsea is unchanged</p> <p>The objectives in the Nailsea local plan are rendered more difficult by the proposed nomination of a so-called "strategic gap " between Nailsea and Backwell . This separation already exists due to the main line railway and existing major road networks. The currently proposed strategic gap achieves nothing new but creates a need for development in other nearby, though currently undeveloped and totally separate areas, as can be seen in the alternatives now published.</p> <p>The creation of the proposed gap between the existing southern edge of Nailsea and the railway station as is evident from the proposals developed by North Somerset planning department, would mean that, in order to achieve the agreed new housing targets, new building would be located to the West or to the North of the existing town creating a need for new access to the town centre and public transport,especially rail, services. The now proposed use of these currently open areas of mostly green belt farm land would conflict directly with the social ,economic and environmental objectives on which the entire approach to planning to meet the identified housing needs of the JSP is based.</p> <p>The strategic gap proposed in the current Nailsea plan should be abandoned, permitting use of this area to the South of Nailsea for housing and local employment for the benefit of the local community and without prejudice to the overall planning standards and objectives of the local JSP.</p>	
Diane		<p>I do not support the vision that expansion will be focused on the South West of Nailsea. I support developing a number of new sites around the North and West peripheries of the existing town. Please see my comments, above, on the vision for Nailsea.</p> <p>I do not support the proposal for a new highway between Hanham Way and Station Road [W3], or a connection to an onward route to provide a direct access to the A370 beyond Backwell to Bristol [E3]. Please see my comments above on the Nailsea and Backwell Transport Schemes.</p> <p>Please add a reference to improvements to rail services (frequency, routes, reliability, passenger experience).</p> <p>I support retaining the current extent of the strategic gap and redesignating it green belt, including Backwell Lake and its environs.</p>	
Dovecote		<p>The JSP seeks to ensure the integration of a south west location for the strategic development—it needs to deliver on that</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>A wraparound approach has been proposed by Nailsea Town Council as an alternative to the JSP proposals. This would see Nailsea miss out on the opportunity that would be afforded by leveraging what the JSP is offering</p> <p>Leveraging the area to the south and west would be Nailsea's best, and probably only, chance to bring significant growth in employment into the area</p>	
Environment Agency	Environment Agency	Nailsea/Backwell – Development needs to avoid fluvial floodplain, as there is pressure on the Internal Drainage Board in this area, any additional surface water draining to main-river will mean that drainage networks will further struggle to drain into the main-river and therefore fields will remain wetter for longer. Proposed developments would need to provide reduced runoff rates and long term storage to prevent volume increase.	
J Cayzer	Nailsea School	<p>Response to the Nailsea Workshop Feedback Report which was published during the Issues and Options consultation:</p> <p>Nailsea School is not at capacity and this should be considered. The main point around a " new secondary " school that should be highlighted is that this does not mean a new school as a unit, but the development will generate sufficient numbers for an additional school but these of course could be accommodated within existing schools.</p> <p>There are also comments re Backwell School - "new students will put pressure on them due to additional applications" and that Nailsea School cannot expand are both assumptions which we would like to question.</p> <p>There are also comments re pupils being driven to school as they are applying out of the catchment area for local schools. Numbers at Nailsea School have risen year on year in recent years. Local schools for local students is happening as set out in the wishes of North Somerset Council and as supported by our local community.</p>	
J Howard		<p>Supportive overall but with the extent of the strategic gap reviewed as suggested to ensure that the town potential can be realised and that any development is well located and connected to station. Alternative scenario 3 does not achieve this.</p> <p>Any expansion to the west should be limited to preserve ecologically sensitive landscape and avoid inappropriate forms of development disconnected from the town centre and railway station, both of which need to be enhanced by development. Development to the west will be too far from the town centre and require a further local centre to provide everyday needs impacting on the vitality of the town centre, which needs to be fully supported.</p> <p>More development to the south close to the railway station is far more sustainable closer to the town centre and enables good links for the existing south west Nailsea to be connected directly to the station via new paths and cycle link and road.</p> <p>Enhancement of the station is much welcome. With the redevelopment of Temple meads that has happened and is due to occur both with the University campus and in the area close by i.e. St Phillips (as proposed by Bristol City Council) during the life of the plan, Nailsea and Backwell station will become more important and provide a direct link to this economic hub and benefit accordingly, arguably having better access than many suburbs of Bristol.</p>	
J Purcell		I write to express my concern about the proposed road building included in this plan.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>As proposed this would increase the traffic, from both new domestic and industrial builds, coming out of Nailsea and going through Tickenham, towards Clevedon and the M5 at J20.</p> <p>Tickenham only has a narrow B road going through it. Narrow footpaths, where they exist, already make it a treacherous walk especially at peak times, with an ever increasing number of HGV's thundering through, which the road is not suitable to take. Regularly there are near misses as cars rushing, go through red lights at the only pedestrian crossing.</p> <p>The local primary school sits on this road, with children and parents walking to and from the Village Hall, the designated safe walking option. Further traffic increases would increase the peril the children and their parents face, not to mention further deterioration to the air quality, they and the local residents are exposed to.</p> <p>Tickenham is not a traffic corridor. It is a residential and very socially active village. The majority of houses are directly on the B3130. At peak times, trying to get out of your drive can be a time consuming affair.</p> <p>Proposals that purposefully increase traffic flow, cars and industrial vehicles, through a residential village, is irresponsible and should be avoided.</p> <p>Alternative and better options should be furthered, like the proposed direct link to J20 of the M5 from Nailsea, which itself raises issues, which would need addressing before being progressed.</p>	
John		<p>I wish to offer my opinion regarding the road changes described on pages 31 and 32 of the 2036 local plan. My opinion is that road works W4, W5, and W8 can be dropped or at least delayed. The link road between M5 junction 20 and Nailsea should be built first with the intention of providing a direct link from the M5 to the industrial estates in Nailsea. This road would take all heavy lorries away from the present unsuitable routes as well as a lot of commuter traffic. Plus there would be very little disruption to existing traffic caused by the construction related traffic and works. Once this link is built, you can re-measure the traffic on the other roads to be sure of the effect of the link.</p> <p>If you do all the bits and pieces that you propose first, you will spend a lot of money and cause a great deal of disruption during the works. If you then built the link road, all that money and disruption will have been for nothing as the link road would take most of the traffic. You may even find that the link road may allow a less expensive plan for around Nailsea and Backwell station.</p> <p>Northern way, Clevedon doesn't need a bypass. The congestion at the Castlewood mini roundabout is caused by our council staff who all leave the office at the same time. Possibly at the same time as school traffic. The rest of the day there is no serious congestion caused by the roundabout. Queues along Northern Way southwards are due to the motorway access at the Moor Lane roundabout, which could be alleviated by having a dedicated feed in lane onto Ettlingham way similar to the one from Weston onto the M5 northbound lane at junction 21. I don't think that a bypass would even be mooted if the Council offices were somewhere else. Its a bit of a waste of money and land. The link road to Nailsea from junction 20 will ease the traffic at the Castlewood roundabout and the congestion there. So that is even more money saved and construction disruption avoided.</p> <p>As for trams and Metro buses running from Backwell to Bristol, by all means build dedicated lanes to Bristol, but just use normal buses. Buses are more flexible and more cheaply and easily replaced when they break down. The present Metro from Ashton P&R into Bristol has expensively equipped guided buses when in fact there are only three very short sections where the guided mechanisms are used and even these are unnecessary! 99% of the journey is on normal roads.</p> <p>Do it right the first time. Don't tinker. It may seem affordable to do things in bits, but these bits and pieces waste everyones time and money in the long run.</p> <p>Once it was pointed out to me that traffic through Tickenham is affected by the 2036 plan I looked at the Transport section of the document and there is very little said there, but buried in the section on Garden Villages and new communities there is a diagram of quite specific changes to our local roads. I now realise that I need to find and look at the Joint Transport Study and keep an eye out for the Joint Local Transport Plan, because I would hope that there was a far less parochial plan for road development in North Somerset. There really should be a planned route for a road from junction 20 to the airport. The link from Junctio 20 to Nailsea would then be the first part of this road to the airport.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>It isn't totally a north Somerset project, but a motorway link from the M4 east and south of Bristol to join the M5 just south of junction 21 would be another really valuable project for the south west. All the problems between M5 junction 16 and junction 21 would be much reduced, and it would open up areas for development.</p> <p>This is a rather rushed statement of my opinion I'm afraid. I see that the consultation closes at midday on 10th. I intend to keep a closer eye on proposals in future and hope to be more aware of developments and opportunities to comment.</p> <p>Would it be possible for a Council person to come to a Tickenham Parish Council meeting to allow some discussion of this please?</p>	
John Miners		I do not agree that all development should be in the south-west of Nailsea. The alternative would be to build around the town so as the centre of Nailsea remains where it is. This would fit in with Nailsea Town Council's "Vision for Nailsea" approved at Town Council 27 June 2018. This should form part of our Local Plan	
John Miners		The proposed new highway linking Hanham Way and Station Road, should follow the route of Queens Road which is a wide carriageway with a 40mph speed limit and built as a through route, but never adopted as such in the 1970's. Queens Road was built as a highway linking Tickenham & Clevedon to Nailsea & Backwell Station. It wiped out the existing major through routes serving Nailsea eg Old Church Road, Whitesfield Road, Church Lane and Station Road. These were each cut in two and re-formed as cul de sacs.	
Long Ashton Parish Council	Long Ashton Parish Council	Broadly agree. More emphasis is required to promote non car based transport links.	
M Hayman	.	We support the Councils principles set out for Nailsea.	
Mark Funnell, Planning Adviser, National Trust	National Trust	Notwithstanding the concerns we have raised in relation to the proposed development area at Nailsea, should this proceed, the edge of that development – whether that be a road or buildings – should be carefully considered, with the inclusion of landscape screening as required, in order to minimise landscape impacts.	
Michelle Crocker		<p>Please register my support for Tickenham Parish Council's objection to the proposed new road, from the western end of Queens Road Nailsea to the B3130 joining at a point near Washing Pound Lane Tickenham, under the Local Plan.</p> <p>The B3130 through Tickenham has already many issues with traffic and to now inundate it with even more traffic, as I understand it an estimate of an additional 150-300 passenger car units at peak morning time, is unreasonable and definitely not a sensible solution.</p> <p>I completely agree a solution does need to be found to join Nailsea to junction 20 of the M5. I support the Tickenham Parish Council's preference of a direct route from south west Nailsea to J20 as is included as an option in Stage 3 if the transport programmers.</p> <p>I believe this matter should be revisited as a matter of urgency.</p>	
MLC		See attachment	024.docx (14 KB)

Respondent Name	Respondent Organisation	Comment	Attached documents
Nailsea		<p>As already stated the direct bus route is restrained by the fact that the Long Ashton bypass is a 3 lane highway passing over a very high viaduct. It is doubtful if a new viaduct will be built. Therefore any new bus will have to take a longer route north of Nailsea, Failland then on to Bristol. This calls into question the route of the proposed new road linking the station to the A370 at Farleigh.</p> <p>There is absolutely no point in stopping the proposed highway linking the MM to Hamham Way at Queens Road as there is only the very narrow road across the causeway at that point. The new road must go directly across to the B3130. This road should go to A370 west of Backwell.</p> <p>The route of the road E3 East of Nailsea should be considered further as connecting it to station road would destroy the strategic gap</p> <p>New school, GP surgeries etc will be required for the new residents.</p> <p>No high density building around the station</p> <p>Nailsea does not require any more large 4 or 5 bed room houses. Local plan must stipulate types of houses to be built in all areas (specific to that particular area) covered by the plan.</p> <p>The plan must prioritise all the building, infrastructure work in a phased manner to ensure that builders just put up houses where ever they can get away with it</p>	
Nailsea Town Council	Nailsea Town Council	<p>NTC supports housing development wrapped around the current settlement boundary, with a focus on the north of the town. The existing highways constraints must be addressed, and a comprehensive and integrated masterplan for infrastructure must be implemented prior to major housing development. The proposed south west urban extension and an additional retail centre which would compete with, not complement, the existing centre are opposed as having no redeeming benefits in comparison to the alternative options presented in this consultation response.</p> <p>Bullet points 1 and 2 are opposed.</p> <p>Bullet point 4. The focus should be on improvements to the existing road network, and new roads to the north of the town. Any highways proposals which seek to encourage greater use of the A370 are opposed.</p> <p>Bullet point 5. This point is agreed, but the plan must support local, affordable public transport services. The objective must be to incentivise people to use public transport in preference to their car on cost grounds.</p> <p>Bullet points 6 and 7. Cycling and pedestrian routes are essential, and ideally would be part of a network of green corridors.</p> <p>Bullet point 8. Agreed.</p>	
Nailsea Unit Trust (c/o Ellandi LLP)	Williams Gallagher	<p>We support the Council's clear commitment that the proposed local centre should not detract from Nailsea town centre. This is important because a significant amount of investment has been made within the town centre by Nailsea Unit Trust and other key stakeholders and there are substantial further investment opportunities which are being pursued. These investment opportunities will secure the introduction of additional space for new town centre uses, including services that will meet a proportion of the expenditure generated by new residents.</p> <p>Key opportunity sites include the Weston College at Somerset Square alongside the Station Road Car Park which could deliver a substantial leisure and retail offer with consolidated car parking (albeit the Metrolink should positively improve accessibility to the town centre thereby reducing local reliance on cars and improvements to walking / cycling routes to the town centre should be a key infrastructure requirement of the sustainable urban extension).</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>To ensure that the proposed local centre does not undermine the vitality and viability of Nailsea town centre, it will be appropriate and necessary to define the parameters of a Local Centre within the emerging Local Plan. This is in terms of both the types of uses and overall floorspace which should be in line with its position in the settlement hierarchy and should also be subject to sequential and impact test during the plan making process (as required by the NPPF).</p> <p>The NPPF does not include a definition of local centres, nor does the accompanying Planning Practice Guidance. However, Planning Policy Statement 4: Planning for Sustainable Economic Growth (which was superseded by the NPPF) did contain the following definition at Annex B:</p> <p>“Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre.”</p> <p>Whilst PPS4 is no longer technically in force the make-up of local centres nationally has not changed substantially as the retail and leisure industry evolves. This is because the nature of local centres is one of meeting top-up needs or access to smaller scale services leaving larger civic, retailing, leisure and service functions to higher order centres as defined by the Local Plan. The above definition therefore provides a helpful starting point for determining the form and nature of a local centre within the proposed strategic residential-led extension to the south west of Nailsea.</p> <p>Our recommendation would be that the proposed local centre is defined as follows:</p> <p>“Land to the south west of Nailsea will include a new Local Centre which will serve the immediate locality. The uses of the local centre will typically include a small supermarket below 280 Sqm (A1 Use Class), a limited range of other small shops / services A1-A5 (each below 100 Sqm and up to 700 Sqm of total floorspace) and community facilities (D1/D2 uses, each unit below 200 Sqm per unit and up to 420 Sqm of total floorspace). The services could include a surgery, post office, hair dresser and / or nursery. The total floorspace of the local centre should not exceed 1,400 Sqm. All floorspace figures relate to Gross Internal Area. Proposals for the amalgamation of units which breach the above unit thresholds or for the introduction of additional floorspace through mezzanine floors which breaches the total floorspace for the local centre will need to be assessed against the sequential and impact test as defined by the NPPF (this policy overrides the 2,500 Sqm threshold for impact assessment as set by the NPPF)”.</p> <p>In addition to the inclusion of the above definition within the relevant policy of the emerging Local Plan, we would also request that the plan identifies a phasing strategy for the urban extension, including limiting the development / operation of the local centre until sufficient residential development has been delivered to support its turnover. This will reduce the likelihood of trade being diverted from the existing town centre.</p> <p>The key features objectives should include improving vehicular, cycling and walking routes from the urban extension through to Nailsea town centre. The phasing of these should be such that they are in place prior to occupation of the local centre i.e. at the point a reasonable number of homes have been completed.</p> <p>New employment land should be well connected to the existing town centre and also the new residential community through cycle and pedestrian links as well as the Metrobus link. It should also be made clear in the accompanying policy that employment land refers to traditional employment use classes or sui-generis uses which have a similar employment generating function (B1-B8).</p> <p>For the avoidance of doubt it should also be made clear that town centre uses including retail and leisure uses do not constitute ‘employment uses’ for the purposes of the employment allocation(s).</p> <p>The proposed development will require the preparation of a costed Masterplan for review at the next stage of consultation. This will allow consultees to comment on likely phasing options and also proposals for how the scheme will link through to existing communities in Nailsea. Links will need to be enhanced through improving off-site pedestrian and cycle routes to the town centre and also the railway station. This is in addition to identifying when the Metrobus route requirement will be triggered and implemented.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>As with any large sustainable urban extension, a greater degree of community support will be achieved where there is realism from the outset about what infrastructure is viable and at what stage in the phasing of development it will be delivered. For Nailsea, the existing community would, in our view, benefit most from a closely integrated scheme that identifies and secures early delivery of key sustainable walking and cycling infrastructure to existing facilities in the town.</p> <p>The development must not be a standalone, self-serving development otherwise it misses a substantial opportunity to support and enhance a well performing existing town and town centre. Indeed, a standalone development is likely to be counter-productive to the future of Nailsea.</p> <p>As stated in response to preceding questions, key walking and cycling routes to existing facilities need to be identified from the outset, designed and costed and then included within a phased delivery strategy for the development.</p>	
Portishead Town Council	Portishead Town Council	Concern that the highway proposals will exacerbate Portishead's commuting transport issues.	
R Wood		<p>instead of building primarily to the south of nailsea why cant the vision of Nailsea town council wherby building is around the town thus having a Town centre where it should be - In the Town Centre!</p>	
Rocke Associates on behalf of Mactaggart and Mickel Homes Ltd	Rocke Associates	<p>Policy 7.7 of the JSP Publication Document sets out the development principles for the South-West Nailsea SDL. Although the Examination Inspectors have questioned the appropriateness of including the development principles in the strategic policy rather than in the policy framework of the emerging Local Plan, the Joint Authorities have confirmed their intention to persist with them and to have them examined through the JSP process.</p> <p>In the light of the above, the emerging Local Plan should not include a policy that sets out development principles, and it is misleading to consult on principles that have already been subject to statutory consultation through the JSP process, and which are now subject to Examination. The design principles set out in the Issues and Options Document should therefore not be included in a policy in the emerging Local Plan given that the development principles will already have been examined through the JSP process once the Local Plan is submitted for Examination.</p> <p>Notwithstanding, and without prejudice to, the foregoing, the principles should be construed as 'aspirational' rather than prescriptive. The funding and delivery mechanisms have yet to be identified and subject to robust viability testing, in particular the new highway infrastructure. Moreover, the principles imply infrastructure works on land outside the SDLs, and therefore involve third party ownerships. It may therefore be necessary to assemble land using Compulsory Purchase powers and which is likely to incur additional burdens in terms of time and costs of both the process and compensation.</p> <p>The recent additional evidence published in support of the JSP proposals indicate an extremely optimistic and ambitious delivery programme for the new strategic transport infrastructure that is necessary to support the new SDLs (West of England Joint Spatial Plan, Transport Topic Paper 8 Update). It confirms that there are many unresolved issues and uncertainties relating to the funding, land assembly, potential environmental constraints and planning delays, together with little, if any, slack in the programme if the aspirational delivery trajectories for the SDL's are to be achieved. The recent additional evidence therefore simply compound, rather than alleviate, the uncertainties and risks.</p> <p>It is unclear what is implied by the principle that states 'development is to be phased in step with a package of transport infrastructure'. However, as with all major development areas, the cashflow to support infrastructure funding has to be generated from sales revenues, and therefore early phases of development are needed to fund wider infrastructure costs. It is therefore imperative that realistic phasing arrangements are identified that enable residential sales and occupations in advance of major new off-site infrastructure being in place, and therefore supported largely by existing strategic infrastructure in the first instance.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The existing masterplan and application proposals for land north of Youngwood Lane demonstrate how this could be achieved, as well as effective mitigation of ecological issues. Given that it would be subject to a CIL charge, the purpose of which is to levy funding for new strategic infrastructure, and that the Council's Regulation 123 list provides for CIL funding to be used for strategic highway and transportation infrastructure as well as funding for most other areas of social and community infrastructure that are foreshadowed in the development principles, there is no reason why the land north of Youngwood Lane, that is already well advanced in the planning and masterplanning process, should not be brought forward at the earliest opportunity.</p> <p>Since the Council already has CIL in place, then the mechanism exists to secure the necessary contribution from strategic development to the new infrastructure required. It is therefore within the Council's domain to plan for the delivery of the necessary infrastructure in step with development, and to secure the balance of any necessary finance required given that the CIL schedule reflects what is a reasonable levy on development having due regard to viability.</p> <p>With regard to the principle relating to the maintenance of a strategic gap between Nailsea and Backwell, the SAP Examination Inspector was clear in her advice to the Council that, given that there is no national policy for the provision of strategic gaps, or encouragement in Government policy to have such designations, the principle of continuing with the designations should be reconsidered through the JSP and new Local Plan. There is no evidence that the principle of retaining them has been reconsidered through the Issues and Options Document.</p>	
S Ible	Terence ORourke	<p>Page 55 of the Issues and Options sets out the design principles that the evolving masterplan is seeking to achieve. Gleeson broadly supports these, with comments in respect to each principle set out below.</p> <p>"The development of a well-integrated urban extension to the southwest of Nailsea which embraces best practice and innovative approaches to placemaking including technological advances, to maximise the quality and effectiveness of development"</p> <p>Gleeson supports this principle</p> <p>"The design will create distinctive urban and suburban neighbourhoods with a new mixed-use local centre with complements services in the town centre"</p> <p>Gleeson supports this, but reiterates in accordance with previous comments that the development must support the existing town centre and any local centre should only complement the existing town centre, and not compete with it.</p> <p>"The design and layout will be rooted in the natural and historic landscape with design cues taken from the area's historic coal mining heritage. Opportunity to embed the location of former local pits and routes of tramways should be investigated"</p> <p>Gleeson considers design cues should not necessarily be taken from the areas coal mining heritage – the best design approach should be pursued, although this may include where compatible elements of historic coal mining heritage, but this should not be the primary focus.</p> <p>"A new highway between Hanham Way and Station Road is integral to the design and layout of the development and this will connect to an onward route to provide a direct access to the A370 beyond Backwell to Bristol"</p> <p>Gleeson supports this principle.</p> <p>"A high quality direct fast bus service should link the new development, town centre, railway station and Bristol"</p> <p>Gleeson supports this principle</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>“Direct off-road cycle and pedestrian access to the train station will be required from areas within cycling and walking distance”</p> <p>Gleeson supports this principle</p> <p>“Cycle and pedestrian links to the schools, the local centre and existing facilities in the town will also be required”</p> <p>Gleeson supports this principle</p> <p>Housing will embrace a range of sizes tenures and affordability. Efficient use of land will be required with higher densities expected in proximity to the railway station, to the local centre and on the bus route.</p> <p>Gleeson supports this principle, however the location closest to the railway station forms part of the gap between Nailsea and Backwell, therefore lower density development may also be appropriate.</p> <p>A strategic gap between Nailsea and Backwell will be maintained – but may need to review the current extent. A revised gap is integral to the concept diagram although Alternative Scenario 3 would retain the current designated form.</p> <p>Gleeson consider it is essential that the extent of the strategic gap is reviewed to ensure the best outcomes for the SDL in terms of connections to sustainable transport, providing homes well related to the town and existing settlement pattern, and to ensure the quantum of development of the SDL can be achieved in the most sustainable way whilst retaining the Green Belt. The development of land to the south of Nailsea, offers significant benefits. In particular the land in control of Gleeson’s:</p> <ul style="list-style-type: none"> • lies between 1,000m and 1,600m of the town centre and is therefore in an accessible location to existing facilities and services, which can ensure the development supports existing shops and facilities in the town, and where necessary upgrade facilities instead of duplicating them. • lies in close proximity to the station (a minimum of 100m and maximum of 1,600m / 15 minutes walk). This makes it ideal for either walking or cycling The inclusion of land in Gleeson’s control within the SDL (as shown on the concept diagram), and its development for housing, will enable early delivery of a safe and suitable access into the SDL from the strategic road network alongside delivery of the key (and essential) links to the station. Such links are necessary in order to take up opportunities for sustainable transport and necessary to make a sustainable development at Nailsea, given its relationship to Bristol. The inclusion of Gleeson’s land, as shown, will also facilitate early delivery of homes given the proximity to existing services and facilities and opportunities for direct safe and suitable access. <p>There remains an area of land between Nailsea and Backwell which is designated flood zone 2 and 3 (and therefore only suitable for water compatible development). This area is not identified in the concept diagram as being suitable for residential development. We agree with this approach and further note that it will secure the retention of an open gap between Nailsea and Backwell.</p> <p>“High quality green infrastructure will be established throughout and surrounding the development incorporating and enhancing existing natural features and are likely to have a role in managing surface water”</p> <p>Gleeson supports this principle.</p> <p>“Development is to be phased in step with a package of transport infrastructure”</p> <p>Gleeson supports the acknowledgement that development will need to be phased in line with various transport infrastructure improvements.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
SR		<p>Broadly support the design principles the JSP proposes.</p> <p>Fundamentally disagree with NTC's proposals for development in other areas.</p>	
The Baker Family		<p>We have amalgamated our comments on questions 23 and 24 since these are inextricably linked. As the Council will be aware our clients have put forward representations in the context of the JSP supporting the proposed SDL at Nailsea and indicating their intention to cooperate with the Council and other key stakeholders to bring forward their land on a comprehensive and coordinated basis. We have of course recently met with the Council's Planning Policy team to have some initial discussions in this respect.</p> <p>Both the proposed vision and the principles for development are broadly supported in principle, although much of the structure and detail for the form and design of the SDL at Nailsea will necessarily be determined by the baseline evidence which has yet to be prepared. Ultimately it will be this evidence which will inform and determine the eventual master plan. However, it could therefore potentially be premature to prescribe in too greater detail matters that have yet to be fully assessed and evaluated.</p>	
The Belmont Estate	Ridge and Partner LLP	<p>Again, we consider that the principles for development at Nailsea need to highlight the importance of protecting and enhancing designated heritage assets and their settings as a central element of any new development. Furthermore, the Estate remains concerned regarding proposals for new highway infrastructure as identified in earlier representations, including those proposed between Hanham Way and Station Road.</p>	
WENP	West of Engln Nature Partnership	<p>We welcome the principles regarding high quality green infrastructure, SuDS, ecological issues, and their integration. We would suggest the following amendments:</p> <p>High quality green infrastructure will be established throughout and surrounding the development incorporating and enhancing existing natural features and are likely to have a role in managing surface water and will contribute to the delivery of net gains in biodiversity. Where appropriate to mitigate (following the mitigation hierarchy), effective mitigation of ecological issues is central to the development to protect and enhance the nearby sensitive wildlife resource., and delivers net gains in biodiversity.</p>	
Wraxall	Mrs	<p>I agree that any development in Nailsea should be to the south of the town. We have an excellent railway station and it would seem sensible to have development within a short distance of this. I object to Nailsea Town Council's vision for Nailsea which suggests a wraparound development of the town. Surely this is a far more expensive option with, in particular, transport issues having to be addressed right the way round the town, rather than concentrating it to the south and west. Land to the north of `nailsea (which is in the village of Wraxall anyway) is in flood plain area, Green Belt, and a distance from the railway station, and would not seem logical for development.</p>	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	<p>W&F PC recommends the protection of the recreational green space north of the Elms and sensitive landscape of the VLY to set a clear distinction between town and countryside. The land is often flooded and land to the north of the Elms estate and south of the Land Yeo already incorporates a water storage area.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>NTC's Vision to expand radially and construct a link road in the VLY is strongly opposed by W&F PC. Development and new roads in this area are significantly constrained by flood zones and surface water. Development in this area will have a detrimental impact on ecology, wildlife and archaeology. W&F PC's views on local Green Belt amendments are addressed under the response to Q5.</p> <p>It is considered that NTC's Vision for the VLY would be no more of a job creator than that anticipated in the SDL-N. NTC states in its response to the Issues and Options Document that development to the north (i.e. in the VLY) will open up the existing commercial sites/employment sites for further development and lead to the creation of jobs, which no other proposed scenario achieves. WFPC strongly disagree with this as the JSP proposes 10.5 ha of employment land as part of the SDL-N, as opposed to approximately 2 ha anticipated by NTC's Vision.</p> <p>Part of NTC's Vision for development on the VLY is that commuting traffic should be funnelled to the B3128, in order to avoid the B3130 and A370, for access to in and around Bristol. Whilst this may seek to limit congestion on those roads it merely moves the problem to the village of Failand and then ultimately on to either the A370 or the B3129 and potentially Clifton Suspension Bridge.</p> <p>The number of houses that could be developed on the VLY as part of NTC's Vision would not be sufficient to meet the housing numbers proposed by the JSP.</p> <p>It is considered naive to assume that people living in any development on the VLY as proposed by NTC's Vision would not drive to access shops within and beyond Nailsea. Despite its proximity to Nailsea town centre it is still too far for people to walk with bags of the weekly shop and so shoppers would still get in their cars. It is considered that Nailsea town centre has very little scope to accommodate a further demand on its limited parking facilities</p>	
Wrington Parish Council	Wrington Parish Council	The proposed new road appears to cut across the existing station car park. How will the loss of spaces be compensated for? The increase in 'commuter' traffic will generate more car travel and it would be naïve to think that other than only a small percentage of 'incomers' will use cycles or walking as an alternative, clean form of transport.	

Document Part Name Q25. Do you have any comments on the concept diagrams and alternative scenarios set out?

Respondent Name	Respondent Organisation	Comment	Attached documents
Ann Loader		<p>We would like to strongly state our objections to the recently published Joint Spatial Plan in regard to the proposed new road from Hanham Way, Nailsea to the B3130, joining it at a point near Washing Pound Lane, Tickenham.</p> <p>The estimates of additional vehicle traffic at peak flow times is completely unacceptable.</p> <p>The number of vehicles at present including HGVs using the village is unacceptable at the present time let alone increasing vehicle numbers.</p> <p>We strongly object to any further increase of vehicles using Tickenham from the proposed housing developments in Nailsea.</p> <p>North Somerset should reinstate the road previously proposed from Nailsea Wall to Junction 20.</p>	
Avon Wildlife Trust	Avon Wildlife Trust	We are concerned about the impact of the proposed new road on the bat SAC, including potentially severing the retained corridor between developments.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Barton Willmore on behalf of Linden Homes	Barton Willmore	<p>The concept diagram for Nailsea and Backwell presented on page 58 of the Issues and Options document shows only part of this promoted site included within the South West Nailsea SDL. This is illustrated in the attachment (page 4) showing our site (in red) overlaid on the Concept Plan.</p> <p>Given the unconstrained nature of the promoted site and its suitability in accommodating residential, we object to the exclusion of the northern and south-eastern part of the site and request that these areas are also included within the growth area allocation. At present, their exclusion constitutes a profligate use of unconstrained land as follows:</p> <p>(i) Land excluded to the north is immediately adjacent to the existing Site Allocations Plan allocation at Youngwood Lane and well related to the existing urban area, with associated advantages in terms of accessibility to existing services in the town.</p> <p>(ii) Land excluded to the south-east is within a very narrow gap, again unconstrained, and well located to form part of the growth area immediately north of the proposed new Hanham Way - Station Road link road.</p> <p>Linden Homes has not yet undertaken detailed ecological surveys on the promoted site and therefore, the ecological value of the local wildlife site is not currently known. However, it would be illogical to exclude the wildlife site from the allocation as even if turns out to be undevelopable due to ecological constraints, it could serve a dual purpose – i.e., alongside any ecological benefits / mitigation, it could also provide open space and green links across the wider growth area contributing to the overall masterplan for SDL.</p> <p>The same can be said for the apparent ‘gaps’ in the grey growth areas shown on the concept plan for the wider SDL. There do not appear to be any significant constraints driving these gaps and hence a continuous allocation / ‘grey area’ washing over the whole area with development potential would be much more useful in enabling the preparation of a proper integrated approach across the SDL. It is vitally important for sustainable place making that areas well related to the urban area with potential for development and able to facilitate connections across the growth area are not excluded from the allocation’s area of search at this early stage so that when the Council undertake more detailed technical work, an evidence based judgement can be made in refining the precise the allocation in due course.</p> <p>We also support development on part of the strategic gap between Nailsea and Backwell (as per the concept plan and alternatives 1, 2 and 4) as the smaller gap is still suitably significant whilst enabling development to take place that is well located to the existing Nailsea urban area.</p> <p>In summary, we support the SDL at South West Nailsea and recognise its strong performance in the sustainability appraisal of the JSP.</p> <p>However, we object to the exclusion of the northern and south-eastern part of our site and request that these areas are also included within the growth area allocation. We also promote the allocation of a continuous area of land at south west Nailsea (devoid of any gaps) that will support an integrated approach to be taken to development, access routes and green infrastructure across the whole site.</p>	23475 A5 LKT jmm 181210 SW Nailsea complete reps.pdf (1.1 MB)
Blagdon PC	Blagdon Parish Council	We have no specific comments.	
Cramp/Apps		<p>We would like to strongly state our objection to the recently published Joint Spatial Plan.</p> <p>In regard to the proposed new road from Hanham Way, Nailsea to the B3130, joining at a point near Washing pound lane, Tickenham.</p> <p>The estimate of additional vehicle traffic at peak flow times is completely unacceptable, the number of vehicles at present including HGV’s and Farm and Emergency services, using the village at present let alone an increase in numbers is too much.</p> <p>We strongly object to any further increase of vehicles using Tickenham from the proposed housing developments in Nailsea.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Diane		<p>North Somerset should reinstate the road previously proposed from Nailsea Wall to Junction 20.</p> <p>The concept diagram is an improvement on the one shown on the interactive map in the previous Generating Ideas consultation, in that the proposed development is more tightly wrapped round the existing periphery of Nailsea and does not extend into the surrounding countryside to the same extent.</p> <p>However, this still shows the development concentrated in the South West of Nailsea. I do not support expansion focused on the South West of Nailsea. I support developing a number of new sites around the North and West peripheries of the existing town. Please see my comments, above, on the vision for Nailsea.</p> <p>Key Feature 2: I support retaining the current extent of the strategic gap and redesignating it green belt, including Backwell Lake and its environs.</p> <p>Key Feature 1: If the proposal to develop to the South West of Nailsea is upheld, I support locating the employment area further west than is shown on the concept diagram. This brings it closer to the new residential areas, outside the strategic gap, which would be a more suitable location – see the interactive map in the previous Generating Ideas consultation. The employment location shown on the current diagram is too close to the strategic gap and Backwell Lake.</p> <p>Key Feature 4: I do not support the proposal for a new highway between Hanham Way and Station Road [W3], or a connection to an onward route to provide a direct access to the A370 beyond Backwell to Bristol [E3]. Please see my comments above on the Nailsea and Backwell Transport Schemes.</p> <p>Key Feature 7: I support the retention and safeguarding of existing designated wildlife areas to the west. Please add reference to the retention and safeguarding of the existing wildlife areas of Backwell Lake, Backwell Common, Trendlewood Park and Kenn Hedge.</p> <p>Alternative scenario 1: I do not support this scenario. It has all the same disadvantages as the concept diagram, and, in addition, the concept of a new distributor road round the edge of the development would intrude significantly more into the surrounding countryside, with a significantly greater impact on the environment and wildlife habitats. This proposal has much more of the appearance of a trunk road, which would attract through traffic to the detriment of the local environment and the quality of life of the residents. If despite objections the development and the road are approved, running the road through the development which it is intended to serve makes much more sense.</p> <p>Alternative scenario 2: I do not support this scenario, as it involves greater intrusion of the development into the surrounding countryside, with a significantly greater impact on the environment and wildlife habitats.</p> <p>Alternative scenario 3: This scenario has most of the same disadvantages as the main concept, however if despite objections, the development in South West Nailsea is approved, I strongly prefer this scenario to the main concept, <u>provided that</u> it can be achieved without alternative 2 (expansion further west). My reason is that it provides greater protection for Backwell Lake and its environs than the main concept. The current strategic gap can then be redesignated green belt.</p>	
Diane		<p>I support developing a number of new sites around the North and West peripheries of the existing town. This will maximise utilisation of the existing town centre, facilitate the improvement of existing transport infrastructure, for metrobus and private vehicle, serving the development sites to the West and North West of Nailsea already allocated within the local plan to 2026 and the industrial areas to the West and North of Nailsea, as well as the new developments to 2036, and deflect traffic from the Nailsea developments away from the congested centre of Backwell, avoiding the massive infrastructure complexity, cost and lead time to deliver a new link road. It will also maintain the separate identity and character of Nailsea and Backwell by avoiding the construction of a major link road in the strategic gap and green belt between the settlements.</p> <p>Infrastructure improvements to include:</p> <p>Improvements to the B3130, providing access to the M5 J20 at Clevedon and link to the Long Ashton bypass via Wraxall.</p> <p>Metrobus route from Clevedon to Nailsea along the existing B3130 via Tickenham and from Nailsea to the Long Ashton bypass along the existing B3130 via Wraxall.</p> <p>Metrobus link to the railway station from the B3130 Nailsea High Street via Station Road. Metrobus route Bristol-Backwell along the existing A370, suitably upgraded.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Possibly add a metrobus-only route (not road) from Backwell SDL to West Nailsea. From West Nailsea the route should then proceed along Queens Road in Nailsea (this is a wide 40mph road which is substantially underutilised and could accommodate a metrobus lane with some upgrading) to join Station Road and thence to the railway station. Possibly upgrade Mizzymead Road in Nailsea (also a wide road) to route the metrobus to the town centre.</p> <p>If necessary, a new road/metrobus to the north of Nailsea could also be considered. Create a new road and metrobus route from the Backwell SDL, around the West and North of Nailsea, serving the development sites to the West and North West of Nailsea already allocated within the local plan to 2026 and the industrial areas to the West and North of Nailsea, as well as the new developments to 2036.</p>	
Donna van der Weyden		<p>I would like to fully support Tickenham Parish Council on its comments to you regarding the above Plan and the impact on Tickenham Village and Nailsea Moor.</p> <p>I do not support plans for a new road transversing this historic moor which is also a place of natural beauty to be protected.</p> <p>I believe the temporary road constructed by the Pylon companies will then be adopted by NS Council as a free permanent road.</p> <p>Please log my objections to these plans together with my Parish Council.</p>	
Environment Agency	Environment Agency	<p>A new road is proposed between Nailsea/Backwell and the M5 Junction 20. This would need to avoid the fluvial floodplain around Nailsea, Tickenham and Kenn Moors unless floodplain compensation was included or a bridge/causeway with openings to allow floodplain connectivity was provided. It would also need to cross strategic watercourses such as the Yearling Ditch, which has an important control structure at Cooks Clyce, Blind Yeo and the River Kenn.</p> <p>A link between Hanham Way and the B3130 at Stone Edge Batch (W4) could impact on the Land Yeo where we already have issues with steep and leaking river banks, where the Land Yeo is elevated above the natural floodplain. Contributions from any scheme could be sort to provide a permanent solution to issues here.</p> <p>A new highway link between the B3130 and Junction 20 [W5] on the edge of Clevedon would need to cross the Land Yeo, within designated floodplain. Compensation maybe required if the road is raised to avoid flooding issues.</p> <p>A link road from Nailsea via the Backwell Lake area, to Long Ashton bound A370, will pass through fluvial floodplain. Compensation maybe required if the road is raised to avoid flooding issues.</p>	
Gill Brown	-	<p style="text-align: center;">Observations on Nailsea Town Council's vision for development in the greenbelt to the north east of Nailsea</p> <p>In addition to the comments I made at the planning forum, I would like to make the following observations, which elaborate on some of the points I made about the importance of preserving the area of greenbelt to the north east of Nailsea.</p> <p>I have read Nailsea Town Council's Vision for Nailsea and am very concerned that they have requested North Somerset Council to adjust the boundaries of the greenbelt to allow for the development of the land between the Land Yeo and Nailsea as part of the North Somerset Local Plan.</p> <p>This area is of ecological significance due to its proximity to the Land Yeo (on the northern boundary), and a Site of Nature Conservation Interest (Towerhouse Wood, and an area of grazing marsh and alder carr). It is a valued, easily accessible, landscape close to the town centre and well served by footpaths which are regularly used by members of the local community and others from further afield.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The Land Yeo</p> <p>The Land Yeo is an important wildlife corridor. Notably, otters are known to use the river on a regular basis and water voles have been recorded in the area. Other species seen on and around the river include, kingfishers, little egrets, snipe, grey wagtail, and herons.</p> <p>The river feeds the Nailsea, Tickenham and Kenn Moor SSSI. This area is designated for the assemblage of plants and animals associated with its rhynes, so water quality is of paramount importance.</p> <p>Area Proposed for Development</p> <p>A large part of this area has been grazed by cattle for many years. It is divided by a number of species rich hedges with mature oak trees. The hedges themselves are historic, but heavily managed. The land slopes towards the Land Yeo, steeply in places.</p> <p>The land acts as a buffer between the town and the wildlife rich corridor of the river, the grazing marsh and the woodland beyond. The hedges support birds and bats, and the grazing land supports a colony of house martins which nest annually in Greenfield Crescent as well as swifts and swallows. Kestrels are seen hunting in the area, and barn owls nested successfully at Jacklands Fishing Lakes in 2016 and 2017.</p> <p style="text-align: center;">Adverse Impacts of Development</p> <p>Loss of Amenity</p> <p>The benefits of nature to health and well-being are well documented. People are now being encouraged to get out into the countryside in order to reduce stress and increase productivity. Time spent with nature is known to be beneficial for those with mental health conditions, and is now being prescribed by an increasing number of health care practitioners.</p> <p>There is a strong argument for not considering a well used, and much loved, area of countryside, which is within walking distance of the homes of many Nailsea residents, to be a suitable location for development. It is my belief that Nailsea Town Council significantly undervalues the importance of the area for the mental and physical health of the adults who walk there regularly, and the children who play in the woods and fields. Municipal open spaces and sports facilities located elsewhere would not compensate for the loss.</p> <p>Given the national decline of high streets due the rise in online retailing, the belief that building 600 or so houses there would help to rejuvenate the town centre is questionable. The impact that the proposed development would have on wildlife and the local community is not, although, unfortunately, the costs are not quantifiable.</p> <p>If a bypass was built through the valley it would act as a barrier separating the town from the river and Towerhouse Wood. The impact of the traffic would make the area much less attractive to walk in and restrict access by unaccompanied children who, bucking the national trend, play there at present.</p> <p>Development would have an adverse impact on the setting and tranquility of Towerhouse Wood, and the Ty Sculpture trail, a popular (and free) family attraction. It would also affect the peaceful, rural setting of Jacklands Fishing Lakes to such an extent that it would be likely to result in significant loss of business.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Air Quality</p> <p>There is a high incidence of childhood asthma, and glue ear, in the area, which is known to be damp. In the autumn and winter the valley is frequently shrouded in heavy mist, and there are often inversions which would prevent traffic fumes from dispersing quickly.</p> <p>Traffic</p> <p>Development would increase traffic on the B3130, which is already heavily congested at busy times and has a major pinch point through Stone Edge Batch, where there are often hold ups due to large vehicles having difficulty passing. A new road through the valley would do nothing to alleviate this problem.</p> <p>Nailsea Town Council states that a road would ease traffic problems in Nailsea but, in the 28 years I have lived here, I cannot recall a significant hold up on the stretch of road that would be bypassed, despite regularly crossing Stockway North, often during the rush hour.</p> <p>Water Quality</p> <p>Development would lead to a significant increase in runoff into the Land Yeo. Sustainable urban draining may control the rate at which the water enters the river and reduce the likelihood of flooding, but it would be a major undertaking to ensure that pollutants, such as phosphates from tap water, would not adversely affect the SSI downstream, where significant sums of money are currently being invested to improve water quality.</p> <p>Wildlife casualties</p> <p>If a road was built through the valley there would be a high likelihood of wildlife casualties. Large mammals such as otters, badgers, foxes and deer would be at risk and could cause serious accidents. Barn owls are also vulnerable, as they fly at low levels when hunting, and can be sucked into the traffic stream by air turbulence caused by large vehicles.</p>	
Heather Holbrook		<p>As a life-long resident of North Somerset, I am writing to you to my express my views with regards to Local Plan 2036 and the proposed future development of the Nailsea region in accordance to the Government's commitment to provide much needed, affordable housing throughout the UK.</p> <p>North Somerset Council's proposal to develop in the South of Nailsea, to me, makes complete sense on the basis of it's proximity to Nailsea and Backwell station (as the vast majority of residents will be commuting into Bristol, daily, for work) and, of course, Bristol Airport.</p> <p>I fully support this plan but have concerns that there has been opposition from Nailsea Town Council who are asking for the North side of Nailsea to be the area for the development instead. This would mean that the precious and vital Green Belt would be built on and, in my opinion (and that of all of my friends and family in North Somerset, Bristol and the surrounding areas..) would only be the 'thin edge of the wedge'.</p> <p>There is major concern that if this should happen then, over time, developers will continue to be given permission to build on 'good' Green Belt (such as this one) which provides essential, natural habitat for wildlife as well as supporting the health and well-being of local residents, walkers and ramblers.</p> <p>I appreciate the time you have taken to read this email and sincerely hope you take my opposition to this proposed, alternative plan, and everyone else who has expressed similar concerns, extremely seriously.</p> <p>I look forward to hearing that the original plan to build away from the Green Belt is the one that North Somerset Council will approve.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
J Howard		<p>Alternative scenario 3 does not deliver Vision for Nailsea and creates pressure for unsustainable, disconnected and poorly located development to the west, which will have serious ecological impacts and impact on the vitality of the town centre.</p> <p>The strategic gap needs to respect Backwell lake and designated ecological areas as well as reflect natural (flood plain , river courses) as well as physical barrier of the railway line, which all form a natural strategic gap. Adopting this approach enables as much sustainable development as close to the station/transport hub as possible. Scenario 1 achieves this better than 2. Scenario 3 does not enable sustainable development. More development close to the station reduces unsustainable development to the west to meet housing needs.</p>	
J Price		<p>I am writing regarding the proposed building on the green belt in the valley between Nailsea and Tower House woods.</p> <p>I am very much opposed to this as it is Green Belt land which needs to be protected.</p> <p>It is a vital space for wildlife such as otters, horseshoe bats and many more species as well as being a vital space for leisure activities.</p> <p>It is on a floodplain which does frequently flood at present and this would increase with development.</p> <p>Increased traffic in and out of Nailsea would cause more issues of pollution and traffic chaos.</p> <p>I urge North Somerset not to alter our Green Belt valley environment and I object to Nailsea Town Council's vision for the valley.</p>	
John Miners		<p>Scenario 1 is like an M25 around Nailsea. Scenario 2 would completely destroy the whole of West End, hamlet. Scenario 3 merges Nailsea & Backwell into one town. Scenario 4 links Backwell & Chelvey.</p>	
Judy Hall		<p>The valley between Nailsea and Tower House Wood, Wraxall</p> <p>I would like to protest most strongly about Nailsea Town Council's proposal to remove the Green Belt from the valley and to build 600 houses, commercial development and roads.</p> <p>The land belongs to Wraxall NOT Nailsea and is a beautiful rural escape for many people.</p> <p>The plan for two roads from the B3130 emerging by the trout fish farm at Jacklands Bridge and further up the road just above Pound Lane the vehicular access will be horrendous.</p> <p>In the South of Nailsea they have the A370 and the main railway line with a proposal of the Metro going there too.</p> <p>The Valley was put into Green Belt status in 1985 because of its' wildlife corridors, river, vital green space and pleasant relaxing countryside.</p> <p>It is one of the oldest inhabited areas in England an (excavated but covered) middle Stone Age site is there and the calm that comes over anyone walking on the footpaths there is so palpable</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>If the plan is allowed the noise, concrete, roads and commercial development the peace will be gone forever. Nothing to hand down to future generations to appreciate the beauty of North Somerset.</p> <p>Of course you must also realise the flood risk from development of this very boggy land.</p>	
K Stradling		<p>Having lived in Nailsea virtually all my life, I have seen many changes in 73 years, some good, some not!</p> <p>Nailsea is now joined up with what were also villages, such as Wraxall, and building is occurring in the direction of Backwell, with the proposed removal of Greenbelt and building on the valley, Nailsea will no longer be a village/ town in its own right, it will be a part of a supertown, including, the other towns and villages around it. There is no infrastructure in place to support this.</p> <p>If this valley loses its Greenbelt status, the habitat for huge amounts of wildlife and therefore the wildlife will disappear. These include Otters, Kingfishers, Horseshoe Bats, slow worms and many many more. This land is also next to land that has SSSI status. This valley is prone to flooding, we often have swans swim along the floods in the fields beside us. Over the last few years a piece of land that backs onto our garden and borders the land in question, had industrial unit and storage space plus hard standing put down, in doing this they significantly raised the ground level and has made our garden much wetter, and boggy. These natural drainage areas are so important, also it has pushed wildlife into an even smaller area. Some protected oaks were stripped of all their branches leaving just trunks standing, and the land is littered with around 40 shipping containers, tanks etc, that never move, and are an eye sore. We have now a restricted outlook and if they remove the Greenbelt it will be gone forever.</p> <p>Our Children's children need and deserve a future that includes green land and not stories of what was.</p> <p>I sincerely hope that the Greenbelt is here to stay.</p>	
Kate McKee		<p>Summary</p> <p>While I would question whether such a significant number of new residential properties is needed at towns such as Nailsea and Backwell, if they are required, I am supportive of North Somerset Council's proposal to develop to the south and west of Nailsea for the following main reasons:</p> <p>Transport</p> <p>I am supportive of the transport strategy in North Somerset's proposals. The proposed areas for new housing development are located next to good transport links of the A370 and the local train station (Nailsea & Backwell station). The latter, in particular, should enable residents to commute easily into Bristol where it is inevitable that the majority of them will work. The</p> <p>Green belt</p> <p>I am strongly opposed to the removal of land to the north and east of Nailsea for the Green Belt for the following reasons:</p> <ul style="list-style-type: none"> • Exceptional circumstances do not exist to warrant a review of this Green Belt. • The Green Belt Assessment in the JSP shows that the land in this area is 'contributing', meaning that it is in the top ca. 20% of significant Green Belt. • The Green Belt land to the North East of Nailsea (between Nailsea and Wraxall) serves to prevent the merger of Nailsea and Wraxall, safeguards against further encroachment of residential or commercial buildings on this beautiful and richly biodiverse valley and enables the setting and special historic character of the village of Wraxall to be maintained. This is one of the reasons why this area of North Somerset is such a sought after place to live. • The 'replacement' of one area of Green Belt with another, as proposed in Nailsea Town Council's 'Vision for Nailsea' is not possible given that each area of land should be assessed on its own merits. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Flooding</p> <p>The land to the north / north east of Nailsea is low lying and prone to flooding throughout the year, having often flooded in the five years that I have lived in Nailsea/Wraxall. Removal of this land from the Green Belt and development on it, as proposed in Nailsea Town Council's 'Vision for Nailsea', seems wholly inappropriate on the basis that it is very likely to increase run-off and worsen the existing problem of flooding in this area.</p>	
Kit Stokes	StokesMorgan Planning Ltd	All are fundamentally flawed because they adversely impact the NS and Mendip Bat SAC and intruduce a new road crossing through the SSSI/Causeway to Tickenham.	
Local Access Forum	Local Access Forum	<p>Nailsea is a more difficult area for new build as it has no easily accessible A road to help funnel away traffic. Talk of getting a new road link and motorway junction through to Clevedon seems unrealistic, simply on the basis of expense – it would be unjustifiable for such a small town. Similarly, it is completely unrealistic to think that people would drive back towards Clevedon if their ultimate destination is Bristol. Consequently, any new build here will result in a huge increase of traffic through Wraxall and up over the hill to Failand and Portbury, areas which are already suffering from high volume, fast traffic on small rural roads. As a result, it seems more logical to the LAF not to build in Nailsea at all, but to put this particular new settlement much closer in towards Bristol, preferably inside the new ring road. This would also mean that residents there would have far greater access to existing infrastructure – schools, doctors, public transport etc. Failing that (by far the most sensible solution), any new build should be on the east, not west, side of the town where there is a far greater possibility of building a link road towards the A370.</p> <p>The LAF's other comment would be, again, that the new walking/cycle paths automatically become multi-user and should be linked to the existing network in order to get the gain from increased usage and encouraging people into a more healthy lifestyle. There also needs to be a multi-user path linking Nailsea and Clevedon, and subsequently to the Strawberry Line. This would benefit both leisure and commuter use.</p>	
M Holbrook		I would like to express my support for North Somerset council regarding their proposals to concentrate new housing developments to the south east of Nailsea. I believe that this proposal satisfies the council's obligation to provide vitally needed housing whilst protecting our valuable and irreplaceable green belt.	
Mark Funnell, Planning Adviser, National Trust	National Trust	<p>Our response to the Nailsea and Backwell proposals, and their associated highway infrastructure, stems from the Trust owning and caring for special places including Tyntesfield to the east of Nailsea, and Cadbury Camp on the Tickenham ridge.</p> <p>All the scenarios show the same indicative link eastwards to the A370, so we have no specific comments on the relative merits of the scenarios.</p> <p>It is however noted that on page 32, in the "Plan A: Clevedon to Bristol transport schemes" diagram, there is a blue line showing the proposed new road from Nailsea/Backwell crossing the railway and joining the A370 at Farleigh. It is understood that this would involve an underbridge to cross the railway. This proposal is likely to have much less impact on the views and setting of the historic parkland and other heritage assets at Tyntesfield than the indicative route set out in the Joint Spatial Plan.</p> <p>Also in relation to "Plan A: Clevedon to Bristol transport schemes", and as we have noted in relation to the Joint Spatial Plan, the "long term potential link" to the M5 junction 20 shown in yellow would run across open countryside could negatively impact on the wider landscape, and on the views and settings of heritage assets such as Cadbury Camp on the Tickenham Ridge.</p>	
Mervyn Bridgwater		I found the report an over wordy encyclopedia of assumptions which to me read more like a student's thesis for a PhD in Town Planning than a serious attempt to address the real issues and face the facts. Referring only to the Tickenham bit to propose increasing the volume of traffic flow throw W4 and then out at W5 would be like connecting a 100 mm dia water pipe in Nailsea to a 50 mm dia pipe through Tickemham and out into a 100 mm dia pipe at W5 in	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Clevedon which would produce a build up of traffic at either end even perhaps inadvertently restrict the traffic through the Village, but that's only my attempt at a PhD. !</p> <p>Its my view these short term proposals are a waste of time and money and should be thrown out in favour of that long time suggestion (about 40 + years or so if my ageing memory is correct) to connect Nailsea to the Clevedon M5 junction with a by pass and not let the issue of "which side of the Church" quite literally get in the way on the correct decision.</p>	
Miss Wendy Beer		<p>I am resident in Tickenham where only now I have news of a press release concerning 'a proposal for a road from the western end of Queens Road, Nailsea, to the B3130, joining it at a point near Washing Pound Lane, Tickenham.' Apparently no-one appears to know who the originator of this press release is.</p> <p>My parents lived in the village of Tickenham some 40 odd years ago. Back then there existed a proposal for a bypass, but then nothing came of it. Wouldn't it have made more sense to have implemented such a scheme then, because costs would have been far less than nowadays? Two sayings spring to mind, (1) the cheapest is the dearest in the long run, (2) short term gain for long term pain. I can see this as the future, unless proper infrastructure is put in place before development of any kind is allowed to proceed. Otherwise it'll be like putting the cart before the horse.</p> <p>It's common sense that the original plan was for a direct route from south west Nailsea to the M5, J20, so why a need to change it? The road through Tickenham is a 'B' classified one, where every day already thousands of vehicles, including large heavy lorries pass along it in both directions, and where many motorists flout the law on speed restrictions. Also there are inadequate pavement areas along this narrow road, which was never designed for such volumes of traffic. Also there is the primary school in the village where parents and children have to negotiate their way along hazardous routes on their way to the school.</p> <p>It seems to me these days that common sense is no longer common, and that the emphasis appears to be on hitting targets and cutting corners.</p>	Attachment.docx (124 KB)
Mr and Mrs Coates		<p>We have studied the local plan 2036 (the "Plan") and recognise the need for more housing, and the contribution required from the Nailsea area.</p> <p>There is obviously a need to link housing development to the location of places of employment to minimise the need for transport resources but we recognise that many people wish to live apart from their work place and may well seek different environments for their home life. This means that the preservation of the countryside, as well as the character of local towns and villages, is vital to ensure the necessary diversity for people to live in and draw satisfaction from.</p> <p>The approach to identifying suitable new centres for additional housing in the Plan is to be commended and recognises the need to preserve green spaces as well as the preservation of gaps between Nailsea and other towns/villages such as Backwell and Wraxall. This is so important to communities who identify with their particular locality and do not wish to be lost in an amorphous mass.</p> <p>We have serious concerns about the proposals being made by Nailsea Town Council which favours development between Nailsea and Wraxall rather than in the south west of Nailsea. The scale of additional housing requires a significant area to be developed to ensure that it achieves a sustainable and enjoyable environment for new residents/ families and should not unnecessarily destroy Green Belt that preserves a countryside environment.</p> <p>Any encroachment on the already narrow Green Belt Yeo Valley environment separating Nailsea and Wraxall would destroy the countrified character of Wraxall which is so appreciated by local residents who shun modern conveniences such as street lighting to preserve the character of the place they live in. It would also destroy the amenity of the Yeo Valley which provides, amongst many other things, a rich environment for wildlife and the destination for local inhabitants to find relaxation. The area is also prone to flooding and is an unsatisfactory location for housing, especially bearing in mind the likely effects of climate change that would exacerbate the situation. There are no special circumstances to support the release of this important area of Green Belt.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>As you have noted the opportunities to achieve a more satisfactory solution to the need for increased transport capacity are rather more straightforward for the development of south west Nailsea bearing in mind the proximity of the railway station and airport plus planned improvements to the A370. The extent of additional commuting needs careful analysis bearing in mind the increasing acceptance of 'working from home' by many employers.</p> <p>We trust that our thoughts will be considered and taken into account and we look forward to reading the next level of detail in the planning process.</p>	
Mr and Mrs Crooks		<p>In response to question 25 (Nailsea concept diagrams):</p> <p>- As the Local Plan correctly identifies, the 'strategic gap' between Nailsea and Backwell is vital to maintaining the separate identities of the settlements. Therefore, we feel that options that maintain this gap as far as possible should be prioritised for taking forwards.</p>	
Mr and Mrs Lindley		<p>Reference Green Belt- Yeo Valley between Nailsea and Tower House Wood</p> <p>We urge the Council to continue to maintain the Green Belt status of this area . It really IS a Green Belt, open by footpath to field and river and woods to all who wish to enjoy it! It is valuable to wildlife and archaeologically important.</p> <p>We have been privileged - as have our children and grandchildren - to benefit from this open access and are desperate for this to continue for generations to come.</p> <p>The proposed development would put a stop to all of the above, would swamp our country roads, particularly impacting on them at the East and West ends of this section of the valley. It would put a severe strain on existing facilities and services and in general destroy the present nature of this area and of Nailsea itself.</p> <p>PLEASE RETAIN THIS GREEN BELT !</p>	
Mrs Hilary West		<p>LOCAL PLAN 2036</p> <p>I am writing to express my grave concerns about the possible loss of Green Belt land on the outskirts of Nailsea, which Nailsea Town Council wants to hand over for a large development of houses, roads and industrial use.</p> <p>I wish to make the following points in expressing my horror at this proposal:</p> <p>The land is not in Nailsea at all, but forms part of the parish of Wraxall.</p> <p>It forms vital green space for the local residents and has always been a much loved and much used resource for recreation. the benefits to people's health of having green space around them is well documented and upheld by scientific research</p> <p>The character of the valley and Nailsea as a semi-rural town will be lost forever and those of us who live on this side of the town will be hemmed in by intolerable amounts of traffic and other pollution.</p> <p>Our native Wildlife is under huge stress at this time, with losses of at least 60% of what we had 20 years ago and this is all due to pressure on land and their habitat for housing development and agriculture.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>I have been documenting this decline for myself over recent years and know it to be a fact beyond doubt. Green space and wildlife corridors such as this valley are vital in connecting our natural habitats to that of the Somerset Levels, which is unique in some cases. If wildlife is to have any chance of adapting to climate change and development pressures, we must keep these corridors protected. Do we want a world without magical encounters with wild animals and the sound of birdsong in the mornings? It will be too late once it is gone.</p> <p>There are other concerns to mention - the area has SSSI designated places and areas of archaeological importance.</p> <p>I implore the Council to refuse this development plan for the sake of the future of all of us in Nailsea and the next generation to come who will benefit from seeing countryside not houses.</p>	
Nailsea		<p>Alternative 1 It is better to have main road going around the edge of the development so as to avoid splitting the development in 2.</p> <p>Alternative 2 risks making the development a separate village from Nailsea - Not good</p> <p>Alternative 3 The strategic gap up to Youngwood farm should remain</p> <p>Alternative 4 Backwell cannot possibly take any more houses</p>	
Nailsea Town Council	Nailsea Town Council	<p>The concept diagram for Nailsea and Backwell (p58) is misleading. By showing only south and west of Nailsea and north and west of Backwell it precludes a wider view. In particular, by not including the town centre (which lies to the north of the diagram) it minimises in conceptual terms the distance of the proposed new development areas from the existing core of the town, including retail, leisure, medical and most educational provision. This highlights again the importance of a focus on the north of the town for development.</p>	
National Grid (E McDonnell)	National Grid	<p>This letter provides National Grid's response to the North Somerset Council Local Plan 2036 Issues and Options Consultation ("the ISO)". It is understood that the ISO is an early stage in the plan-making process and at this stage sets out broad alternatives as to how to accommodate the need for new development in North Somerset and does not concern individual development sites.</p> <p>National Grid operates the high voltage electricity transmission system in Great Britain and owns the system in England and Wales. In May 2014 National Grid applied for a Development Consent Order ("DCO") under the Planning Act 2008 ("PA 2008") to authorise a proposed 400,00 volt (400kV) connection between Bridgwater, Somerset and Seabank substation, north of Avonmouth together with associated development ("Hinkley Point C Connection).</p> <p>The Hinkley Point C Connection Project is a Nationally Significant Infrastructure Project under section 14(1)(b) and s16 of the PA 2008. Its purpose is to reinforce the transmission network in the region and facilitate the connection of the proposed Hinkley Point C new nuclear power station and other proposals for low carbon generation. In January 2016. The then Secretary of State for Energy and Climate Change granted consent to National grid's DCO application and on the 19 January made the National Grid (Hinkley Point C Connection Project) Order 2016 ("the Order"). The Order, which authorises National grid to construct and operate and maintain the Hinkley Point C Connection and to acquire interests in land compulsorily for that purpose, came into force on 9 February 2016.</p> <p>This consultation response relates specifically to Section 4.4 of the ISO. Page 58 provides a concept diagram showing potential areas to accommodate strategic growth around Nailsea. National Grid appreciate that the potential development areas are only indicative and have no concerns to raise about this in principle but would like to record at this stage that part of</p>	<p>Enclosure 1 - HPCC - SW 4 B - REQ 4 - APP C - Combined Plan of Stages - Sheet 3 of 11.pdf (3.2 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>the land which is the subject of the ISO lies within limits defined by the Order that is required for the construction, operation and maintenance of Hinkley Point C Connection. Please find enclosed for your reference a plan titled "Scheme of Stages (Page 3 of 11)" showing the extent and location of the proposed DCO works in the Nailsea area.</p> <p>Under the Order, National Grid is granted both permanent and temporary compulsory acquisition powers to construct, operate and maintain the Hinkley Point C Connection. The order sets out six classes under which land or rights may be acquired permanently or land possessed temporarily. In respect of part of the Application Land, National Grid has the following rights:</p> <ul style="list-style-type: none"> • Class 2 (Compulsory Acquisition of Rights for the Authorised Development), which also includes Classes 3 (access), 4 (construction and mitigation), 5 (dismantling of redundant infrastructure) and 6 (temporary access); • Class 4 (construction and mitigation); and • Class 5 (dismantling of redundant infrastructure). <p>It is imperative that any future development does not compromise or delay National Grid's ability to deliver the Hinkley Point C Connection in accordance with its statutory and contractual duties. National Grid will continue to monitor the progress of the Local Plan 2036 and where relevant, comment on and engage with applicants on specific proposals.</p>	
NationalGrid	Arup on behalf of National Grid	<p>Page 58 provides a concept diagram showing potential areas to accommodate strategic growth around Nailsea. National Grid appreciate that the potential development areas are only indicative and have no concerns to raise about this in principal but would like to record at this stage that part of the land which is the subject of the ISO lies within limits defined by the Order that is required for the construction, operation and maintenance of Hinkley Point C Connection. Please find enclosed for your reference a plan titled "Scheme of Stages (Page 3 of 11)" showing the extent and location of the proposed DCO works in the Nailsea area.</p> <p>Under the Order, National Grid is granted both permanent and temporary compulsory acquisition powers to construct, operate and maintain the Hinkley Point C Connection. The order sets out six classes under which land or rights may be acquired permanently or land possessed temporarily. In respect of part of the Application Land, National Grid has the following rights:</p> <ul style="list-style-type: none"> • Class 2 (Compulsory Acquisition of Rights for the Authorised Development), which also includes Classes 3 (access), 4 (construction and mitigation), 5 (dismantling of redundant infrastructure) and 6 (temporary access); • Class 4 (construction and mitigation); and • Class 5 (dismantling of redundant infrastructure). <p>It is imperative that any future development does not compromise or delay National Grid's ability to deliver the Hinkley Point C Connection in accordance with its statutory and contractual duties. National Grid will continue to monitor the progress of the Local Plan 2036 and where relevant, comment on and engage with applicants on specific proposals.</p>	
Peter Wright		I am writing to express my opinions and share my concerns about the proposed plan to build on green belt space in the valley between Nailsea and Tower House woods.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>We have recently moved to the area and were very disappointed to hear that this space has been mooted for housing, this is designated green belt space and vital green space for the local community. Building here would not be suitable as it will remove the green space between Nailsea and Wraxall as well as it being an area with severe flood risks as well as being a wonderful space for wildlife.</p> <p>In addition to these concerns the B3130 road to Wraxall is already very busy and runs past a primary school so pushing more traffic this way seems unnecessary when there are better available sites for housing closer to the train station, A370 and Nailsea town centre.</p>	
Portishead Town Council	Portishead Town Council	Concern that the highway proposals will exacerbate Portishead's commuting transport issues.	
R Wood		<p>I believe none of these options are truly viable.</p> <p>It will either destroy communities such as West End (do they care?) or the natural landscape and wildlife which has been present for centuries -</p> <p>Look at areas which already have the Infrastructure such as Ashton Vale</p>	
Robert Cleeves	Savills	<p>Please see below my comments in respect of the spatial strategy for delivery of housing in Nailsea – pursuing to the North Somerset local plan review.</p> <ul style="list-style-type: none"> • We understand that the JSP requires Nailsea to find land for a further 2575 houses. • The local plan (under review) shows and supports the proposal on the south west side of the town as this area falls outside the Green Belt. • We do not support development on the Green Belt as identified in both National and Local policy. • There are no very special circumstances presented that would enable the release of Green Belt land in this location and therefore the broad direction of the development should be directed to the south west of Nailsea, as proposed by the Local Plan Review, as this area is not designated as Green Belt land and yet is adjacent to the settlement boundary. • In the Council SHLAA 2018 (part of the evidence base which support the emerging Local Plan review) – sites HE 18225/18136/18226/18223 have all been discounted – these sites are all located on the edge of the settlement Nailsea and all fall within the Green Belt. 	
Rocke Associates on behalf of Mactaggart and Mickel Homes Ltd	Rocke Associates	<p>There is some merit in Alternative Scenario 1 in terms of both placemaking principles and a delivery-focused strategy.</p> <p>In terms of placemaking principles, given that the proposed distributor road is likely to relieve traffic currently using Station Road and its junction with the A370 at Backwell Crossroads, it is likely to accommodate a substantial volume of non-development traffic that has no purpose within the proposed new residential neighbourhoods through which it will pass. To route it through the proposed new residential communities between Hanham Way and Station Road is therefore likely to have considerable negative implications in terms of noise and general disturbance and air quality. Moreover, the road line will function as a barrier to movement, and create segregation within residential communities. This will be a particular issue for the proposed residential areas north of Youngwood Lane/east of Netherton Wood Lane where the proposed road line bisects the residential allocation. Moreover, to the west of Netherton Wood Lane it will create a physical barrier between the proposed new community and the proposed local centre that is intended to serve its needs. It will also create a physical barrier to movement between the existing and future communities, and therefore will not facilitate their integration.</p> <p>Alternative Scenario 1 is also to be preferred in terms of deliverability, and in particular the facility to bring forward early phases of development. A peripheral link road, a principal purpose of which is to alleviate existing difficulties on the strategic highway network, could be completed in phases, with the proposed new development plugging into it as successive phases are completed. It would not constrain development progressing in advance, and which can be served by the existing local road network into which convenient connections can be made. It would also simplify the funding arrangements, given that all development roads would be implemented by the developers, with</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>contributions to the relief road through CIL funding that will be levied in accordance with the existing charging schedule. It would then be in the Council's control to implement the link road at an appropriate stage, and to consider whether they wish to forward fund it to secure its early implementation and recoup the development contributions through CIL at a later stage. Given that the relief road is in large part to alleviate existing congestion on the strategic highway network, the proposed development cannot reasonably be expected to contribute more than part-funding of it, and the mechanism for securing that funding is already in place in terms of the CIL levy.</p> <p>The masterplan associated with the outline application for land north of Youngwood Lane would dovetail well with Alternative Scenario 1. The masterplan incorporates a diversion of Netherton Wood Lane through the site to alleviate the existing substandard stretch between Engine Lane/St Mary's Grove and Youngwood Lane. A connection to a new relief road to the south west of Youngwood Lane could easily be made through a new junction in this location, and which could also accommodate a spur into the adjacent land to the north west. This would enable the land to the north of Youngwood Lane to come forward immediately in accordance with the resolved masterplan, and therefore fulfil the essential requirement for an early phase of development.</p> <p>The Council's Statement of case in connection with the current Appeal relating to the land north of Youngwood Lane confirms that there are no highway or other material planning objections to MM's proposals considered on their merits. The Council's case is solely one of prematurity.</p>	
S Ible	Terence ORourke	<p>Gleeson supports the main concept diagram, and considers that to achieve the most well connected, integrated and sustainable urban extension to Nailsea (noting that there is no justification for exceptional circumstances to review the Green Belt) the strategic gap must be reviewed. This is shown in all scenarios other than alternative scenario 3.</p> <p>The aspiration for the provision of a Strategic Gap is accepted, but this should not impede other policy requirements or the effective implementation of the presumption in favour of sustainable development. If the gap is retained in such a way that it precludes otherwise sustainable development the approach would be inconsistent with national policy and unsound. The aspiration should be considered in tandem with the need to achieve access into the SDL, promote a sustainable pattern of development to ensure high quality links to the train station and a development that is well integrated to the urban area and in close proximity to the train station.</p>	
S Wyatt		<p>I write in response to the Local Plan 2036 for North Somerset, and wish to support the recommendation to protect the Green Belt land between Nailsea and Tower House Wood (to the north-east of the town centre).</p> <p>As a local resident (I live in Yeomead, BS48 1JA), I'm very concerned about Nailsea Town Council's push for North Somerset Council to review the Green Belt for the following reasons;</p> <ul style="list-style-type: none"> • North Somerset Council have historically dismissed this site for development, so have firm and valid reasons for upholding this, as they have done in the past • The valley is designated as 'contributing' Green Belt (Green Belt Assessment in Joint Spatial Plan) and serves as vital green space between Nailsea and Tower House Wood • The land is beautiful green fields and working farmland - it offers a scenic pocket of peace and quiet • As local residents, we regularly walk along and across this land to access Tower House Wood, or for circular walks. We have 2 young children and the opportunity we have to do this on our doorstep is very special to us all. • From the time we have spent in this area of land, we've seen many types of wildlife - birds, insects etc • We've also seen how regularly the land floods - sometimes it makes the fields impassable - to try to develop on this site seems foolish and the resultant water runoff from the roads and buildings will lead to more flooding. • If the industrial area will be increased, there's increased risk of pollution of River Yeo 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • River Yeo feeds into a SSSI - we need to protect the water quality across it's whole length • The resultant increase in traffic created by developing on this area will be an issue - the surrounding road network isn't set up to support extra traffic • Nailsea is already a commuter town - there are very few employment opportunities here for people of a working age. It would be better to focus development nearer to the centres of employment, i.e. Bristol (or at least transport - i.e. Nailsea & Blackwell train station). <p>In summary, I urge you to stand firm and not change your position on the Green Belt and this area of land</p>	
SGD30		Overall very supportive of the plans. Development to the south seems to be the most sustainable option as it's closer to the town centre and railway station. In order to make the most of this the strategic gap probably needs to be revised to include more dead land such as railway and flood plain. Any development to the west would involve creating a subcentre and also result in more traffic.	
SGD30		Scenario 3 seems to create more pressure on the road system and would have an adverse impact on the sustainability of the town centre. Scenario 1 seems to be the best option as it makes better use of ecological areas and the barrier created by the railway line in its application of the strategic gap.	
SR		Broadly support the above plans. Consideration has got to be made for the strategic gap, community sensitivities and environmental impact.	
The Baker Family		Current lack of the baseline evidence and the difficulty of evaluating the apparent preferred concept diagram and the alternative scenarios 1-4 inclusive. It is acknowledged that such work will form an important part of assessing the opportunities and constraints for the development of the SDL but it is not felt possible to express any firm opinions particularly in relation to the alternative scenarios. However, there will be no lack of willing to enjoin with the Council and other key stakeholders in relation to such work in due course.	
Tickenham Parish Council	Tickenham PC	<p>The first Joint Spatial Plan which was produced was welcomed by the village as it clearly showed a new direct highway from Nailsea and Backwell Station to Junction 20 M5 to serve both the existing facilities for Nailsea and the extension of development to the south west. This would have alleviated the traffic problems in the residential portion of Tickenham and the Stone Edge Batch junction particularly in respect of HGV traffic.</p> <p>The latest proposal shown as W4 (package 2) in the Joint Spatial Plan Emerging Findings Transport Report (November 2018) and in the Local Plan 2036 (September 2018) is for a new road to be built from Hanham Way to the B3130 joining it near Washing Pound Lane, Tickenham.</p> <p>CONCLUSION</p> <p>Tickenham Parish Council considers the proposal to build a highway from Hanham Way, Nailsea, to the B3130, Tickenham, is ill-conceived and environmentally totally unacceptable and that a direct route from south-west Nailsea to Junction 20 M5 should be provided as a priority and be co-terminous with housing and employment construction policies. Currently this is included as an option in Package 2 of the transport programme with an indicative construction date of 2030-32. Such a route could easily be extended to serve the southern edge of Nailsea and link Nailsea and Backwell Station with the A370, thus obviating the need for other transport options in those areas, i.e. W3 (part), W4, W5, W8 and E3 as shown on Page 32 of the Local Plan 2036.</p>	
WENP	West of England Nature Partnership	We are concerned about the impact of the proposed new road on the bat SAC, including potentially severing the retained corridor between developments.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Wessex Water (Ruth Hall)	Wessex Water	Please see response to Q3 for comments on Nailsea and Backwell key issues.	
Wrington Parish Council	Wrington Parish Council	All alternative scenarios either impact unacceptably on Backwell (Alt. Sce.3) or the countryside environment surrounding southwest Nailsea.	

Document Part Name Q26. Are there any other options you would add for accommodating strategic growth within Nailsea?

Respondent Name	Respondent Organisation	Comment	Attached documents
Avon Wildlife Trust	Avon Wildlife Trust	We would welcome transparency as to how the Bat Supplementary Planning Document has been applied to ensure sustainable development.	
Backwell Parish Council	Backwell Parish Council	<p>BPC would resist the further western expansion of the urban extension to include or potential extend beyond Nethernton Wood Lane due to the environmental implications highlighted by the Issues and Options Paper. Furthermore, the Council already recognises the remote nature of some of the housing relative to the town centre and outward expansion would further undermine the sustainability of the location.</p> <p>The provision of a distributor route around the SW Nailsea urban extension would be resisted for similar environmental reasons.</p> <p>The strategic gap between Nailsea and Backwell is limited in scale and protects an already narrow gap between the two settlements which is particularly vulnerable to further encroachment. BPC would therefore resist any proposals which would erode the existing strategic gap and would support this land being allocated Green Belt status. Development to the north of Nailsea seems a better solution.</p> <p>These representations are intended to be constructive (to assist NSC in the preparation of the Local Plan 2036) but without prejudice to BPC's objections in principle to strategic development at Backwell and the delivery of significant transport infrastructure within the gap between Nailsea and Backwell. BPC would welcome further dialogue with NSC to inform its proposals during the preparation of the Local Plan.</p>	
BHFP		<p>Overall I agree with the growth to the south of Nailsea so long as the countryside is taken in to consideration.</p> <p>I strongly oppose Nailsea Town Councils proposal to review the greenbelt north of Nailsea (which is actually in Wraxall not Nailsea) and the development of the valley along the River Yeo.</p>	
Blagdon PC	Blagdon Parish Council	We have no specific comments other than there must be close coordination between employment, transport and housing development plans. The transport plans must ensure minimal disruption and long term impact on transport links serving adjacent communities.	

Respondent Name	Respondent Organisation	Comment	Attached documents
C and A Eastwood		<p>I object to Nailsea Town Council's vision for the development of land between Nailsea and Tower House Woods as being a suitable area for development. I do not wish North Somerset Council to alter our Green Belt Valley environment.</p> <p>My husband and I own Jacklands Fishing Lakes which sits alongside the Land Yeo River and adjacent to the proposed development area.</p> <p>We are a small family run trout and coarse fishery with an onsite Farm Shop and small cafe which is regularly visited both by fisherman and locals who enjoy their fishing at Jacklands and watching the wildlife, they often comment on the beauty of the local countryside. We also welcome many families, parents, children, grandparents who enjoy walking the Ty Sculpture Trail in Towerhouse woods and often walk back along the footpath by the river enjoying the valley views. They call our lakes a little Oasis, because sitting here you have no clue you are near to a town, these people are escaping the rat race of life and enjoying our wonderful countryside around us, it's a beautiful area a place of well-being. The proposed development of this adjacent land would be completely visibly and would change the whole beauty of the valley and the habitat of many of our wildlife who frequent this valley.</p> <p>Our other concern would be the amount of additional run-off water coming from the proposed development and where it would go. With this number of houses being proposed the amount of additional run-off would be significant and the only place for this water to go would be the Land Yeo River, in periods of heavy rain this run-off water would have the potential to overflow the River and flood the surrounding area; fields, roads and houses adjacent to the River.</p> <p>Finally the traffic implications at each end of the development is also a concern, these tiny country lanes were not built for the amount of traffic that passes at present let alone the increase in traffic with the proposed development.</p>	
C Jones		<p>Expansion should be closer to Bristol, for example using the South Bristol Link road. Building a highway through Youngwood Lane/Backwell Lake will have a devastating affect on the area. I cannot believe this is seriously being considered.</p>	
CB30		<p>There are so many reasons why not to built on Yeo Valley , personally I would miss that space so much as I walk over there everyday, the wildlife is wonderful, I always feel better after going over there but also I worry about how wet it gets , I certainly wouldn't buy a house over there and I worry how it would impact the surrounding areas. I took these pictures (attached) after just a couple of days rain, last year the river completely covered the fields.</p> <p>I just wanted to add that it may seem just a scrap of land but there is actually a whole community of walkers and wildlife enthusiasts that meet up , I walk the dogs there everyday and would miss that very much as would my friends.</p>	<p>Yeo Valley 1.jpg (2.3 MB)</p> <p>Yeo Valley 2.jpg (4.8 MB)</p>
David Pryce		<p>We completely disagree with any interference to the green belt Valley between Nailsea and Towerhouse woods. We strongly believe there are no special conditions that are present to support any release. This land does flood and any works upon it would have a greater knock on to our and other existing properties. This land is and will always be used for communal recreation and wildlife to flourish in its natural undisturbed environment. I do strongly believe that we do require further housing especially for the younger generation and families as all we see popping up is retirement homes and this reduces the chance of further growth and the town to benefit to all ages. There are many brown field sites which can be used before we dig up green belt and areas of natural beauty.</p>	
J Howard		<p>Development could be located closer to the station i.e. further south of Youngwood Lane as long as it avoids flood plain, although commercial development may be accommodated and perhaps further parking for station or at least the future proofing of master plan to allow later. Employment space could be located on raised platform above parking even. Gap needs to be reviewed along line of alternative 1 to facilitate expansion and growth of development.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Joan		<p>Nailsea Town Council in their comments propose taking the land between Nailsea and Tower House Woods out of the Green Belt. I can find no evidence or reason why this area should be taken out of the Green Belt. It is a wildlife corridor, part of the river floodplain and is valuable amenity land. It is vital green space for the whole of Nailsea which is a great asset to the town providing access to wildlife and it is well documented that access to wildlife areas and open skies benefits people's wellbeing. Also taking one area out of the Green Belt would create a precedent for other areas and Green Belt should be sacrosanct.</p> <p>Nailsea does need more affordable housing to attract younger people to the town but not at the cost of losing good wildlife habitat within Green Belt. NTC propose making a countryside park next to the River Yeo. This would not replace the special wildlife habitat that currently exists. There are more suitable areas which are not in the Green Belt and brown field sites should be used first.</p>	
John Miners		<p>In line with the Town Council's Vision for Nailsea consideration should be made of developing around Nailsea, specifically to the North where a green belt review would be necessary</p>	
K Ayres-Baker		<p>I write in response to the proposal by Nailsea Town Council to review the green belt to the north of the town, allowing the land to become available for development.</p> <p>I am horrified that the town council are pushing for a review of green belt - which totally undermines the very point of green belt - and am fully in support of North Somerset Council's refusal to do so.</p> <p>I have many concerns regarding the potential development of the land to the north of Nailsea, between Jacklands fishing lakes and GE / Budgens, including:-</p> <ul style="list-style-type: none"> -The area is a haven for wildlife, including some protected species eg. bats -Obvious aesthetic issues with building in this beautiful valley -The land is prone to flooding and spends large amounts of most winters under water. I believe approximately 2/3 of the land is below the water table. -Potential for pollution of the river Land Yeo, which feeds into a SSSI -The land isn't even within the Nailsea boundary - it is in the parish of Wraxall! -Green belt should be green belt, end of! -Extensive network of very well-used footpaths -We know the proven impact of access to such areas of green open space on mental health -A link road through this land would encourage an increase in traffic both through Tickenham and on the B3130 in Wraxall, both with village schools on the routes - these schools are already perilous to access due to traffic -Most traffic from the Clevedon direction doesn't go beyond Nailsea anyway - traffic intending to do so would normally use the top road through Wraxall - the B3128 / Clevedon Road -The road would encourage traffic to bypass local businesses 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>-The valley is of historic significance - a mesolithic site with archeological evidence from 6000+ years ago and indeed the Roman villa remains at Birdcombe Court. One finding from this land is actually held in the British Museum.</p> <p>-Great distance to the train station if the desire is to encourage use of public transport - housing this far from the station will increase road traffic volume greatly</p> <p>-Nailsea already has many empty office and retail spaces - is there really any call for a huge increase in housing and work here</p> <p>-To alter the green belt in this area means that North Somerset council would then have to do so in all areas - opening a can of worms for the whole county.</p> <p>-No exceptional circumstances exist to warrant reassessing the green belt</p> <p>I would implore you to consider the many objections to the potential development of this land.</p>	
Kit Stokes	StokesMorgan Planning Ltd	<p>Development to the north would make much more sense and would provide opportunity for link road/bypass for Nailsea from Tickenham to Wraxall.</p> <p>This land is more intrinsically linked to the fabric of the town than the remote land to the south. Also less sensitive landscape.</p>	
KRG22		<p>There is no recognition here of the very narrow country roads serving Nailsea. Whilst there is detail around improving the Station Rd link to A370, much traffic leaves Nailsea towards the M5, where the two main links are effectively narrow country lanes where lorries cannot pass each other. If the development progresses where planned then everyone travelling to M5 will use these inadequate routes, this must be addressed. People will not use bus or train as much as planners seem to think, witness Portishead where the place is overrun with cars, and the M5 junction 19 is already under severe pressure, the very same junction all the extra traffic from Nailsea will head for.</p>	
M Hayman		<p>We have recently been made aware through the local press that Nailsea Town Council and the Developer, Land Value Alliances wish to review their previous suggestions for the Valley between Nailsea and the Tower House wood. We would like to express our concerns for the following reasons.</p> <p>1 Green belt</p> <p>It takes away areas of green belt and does not follow the NS Local plan 2036 proposals. We do not agree that greenbelt should be released and the area currently provides many differing benefits to the community. It will also affect the local wildlife and wildlife habitats.</p> <p>2 The new road way</p> <p>There needs to be more details on the benefits of the proposed roadway and traffic flows. From our house on most mornings and evenings, traffic tails back passed Wraxall school and beyond. The vehicles from this new development will only increase these queues.</p> <p>3 Use of Nailsea and Backwell Station.</p> <p>With the longer term plans to increase the use of the Nailsea and Backwell rail station, the proposal for the development to the north of Nailsea in the valley, either ignores these environmental aspirations or is expecting more traffic from new north development to drive across Nailsea from north to south</p> <p>4 Walking for health and other users of the green areas</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The numbers of groups accessing the Valley have increased over the past few years and this year has seen a steady stream of walkers despite the Barn being closed. Many are the regular walking groups traversing the foot paths to take in the views, fresh air and improve their overall health following Public Health England guidance. Any new development in the valley could jeopardise these health benefits.</p> <p>5 Government Emergency Oil Line</p> <p>It is our understanding that there is a Government emergency oil pipeline running under the area suggested area for the development or road way or both.</p> <p>6 Flood plain and saving residential areas</p> <p>We recognise the Councils priority when operating floods plains in the area. We have concerns about the flood plain in the Valley and how it will cope with any additional surface water created by any new development in the area to the north of Nailsea. It may also create a pollution risk to the river Yeo.</p> <p>7 2 hectares of Employment</p> <p>Is this necessary as there are plenty of brown fill sites in Nailsea that are vacant.</p> <p>For the reasons set out above, we object to the proposal to develop the area between Nailsea and Tower House woods which is Green Belt .</p>	
M Price		<p>I am writing with regards to the proposed Local Plan 2036 for North Somerset, specifically the development of the valley between Nailsea town and Tower House Wood.</p> <p>I am strongly opposed to Nailsea Town Council's vision for the valley. The development of this area would be a disaster for local residents and the loss of the Green belt would be huge.</p> <p>Not only is the valley an archaeologically sensitive area, it provides vital green space and an important wildlife habitat. Development would be detrimental to wildlife. In addition there is a real risk of polluting the nearby River Yeo, causing yet more harm to the environment.</p> <p>Aside from the environmental impact, any structures built on this land are at risk of flooding – you only have to look at the fields after a period of rain to see this is a certainty.</p> <p>Development on this site is actually of no benefit to local residents. The area is too far away from the train station or any local amenities to be viable. This would just mean extra traffic in and around the town. Are there any plans for large business to also move into the area, thus providing more jobs? As it is, the majority of people living in Nailsea commute out to larger towns and cities. There needs to be housing where the work is.</p> <p>In short, I strongly support these plans being shelved and other areas considered for development instead.</p>	
Mrs R W		<p>The Green belt between Nailsea and Towerhouse Woods is not suitable to be used for development. No special circumstances exist to support the release of this green belt and it is a vital area of wildlife that is enjoyed by many in the local community, especially those on low incomes in local authority / housing association housing who may not have the transport or finances to visit green spaces further afield. It gives these children the chance to play and be active locally outside and experience nature on their doorstep. The area is also regularly flooded in winter which would make housing and development problematic.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
N Cooper	Claverham Future	The North Somerset view and plan is disrespectful to local desires and expansion plans.	
Nailsea Town Council	Nailsea Town Council	No. Any proposals for strategic growth which detract from the existing town centre are opposed. Development to the north is considered to be more sustainable than development focussed on the south west. p59 The Key Features are agreed apart from 9 and 11, which are opposed. p60 Alternative scenarios 1 and 2 are opposed. Alternative scenario 3 is supported.	
Portishead Town Council	Portishead Town Council	Concern that the highway proposals will exacerbate Portishead's commuting transport issues.	
R Wood		They should look elsewhere - Ashton Vale??- building a link road will still not solve the issue of lorries and traffic using the country lanes and jamming the system even more than do so now	
S Ible	Terence O'Rourke	Gleeson considers the proposed strategy is most appropriate for accommodating strategic growth at Nailsea.	
SR		Support building on industrial/brownfield sites and other areas outside of the Green Belt.	
Stuart		I am specifically commenting on to the parts that affect the area north of Nailsea; the strip of land between the present housing and the woods. At present this land is used by locals for recreational purposes. Adding more houses and a by-pass to this area will lock local residents in an urban area and deprive them of a natural recreational area that is used by all for walking, enjoying nature and exercising dogs. While it will free up traffic though Nailsea it will also increas traffic through Tickenham but more importantly it will deprive Nailsea businesses of vital customers. Historically all by-passes have had significant effects on the local economy and exceptionally few were positive. While it will reduce the volume of traffic through the north of the town it will mean that commuters are less likely to make a detour and stop to buy those daily essentials. Considering that the town centre struggles as it is, these changes could be the final nail in the coffin and turn Nailsea into the Bradley Stoke of North Somerset.	
W Barker		I wish to express my concerns for the planning visions of Nailsea Town Council. They seem to have no regard for the green belt which is an incredible area of beauty and very important archeological history. I feel this would be a flood risk and also potential pollution of the river Yeo which feeds into a SSSI river. I would like to encourage North Somerset to persuade Nailsea to keep the Green Belt to the North and East. Surely the industry should be closer to major roads A370 nearer the airport and not clog up our already over used roads. I hope this will be taken in account, the depth of feeling in the community.	

Respondent Name	Respondent Organisation	Comment	Attached documents
WENP	West of Englnd Nature Partnership	We would welcome transparency as to how the Bat Supplementary Planning Document has been applied to ensure sustainable development.	
Wraxall	Mrs	Poor Nailsea is not the most attractive of towns. Please, when you consider its expansion, pay heed to the aesthetics. This may seem trite, but there are new housing developments which have appeared recently which make an effort to include attractive features, even in their choice of the colour of the stone for the buildings - Nailsea deserves a more upmarket and imaginative approach if it is to thrive and become a place where people aspire to live. Its town centre is unattractive, can the plans for its growth include some revitalising of this area and make it a destination where people actually want to come and spend their money.	

Document Part Name Q27. What are your views on the proposed options for increasing urban living?

Respondent Name	Respondent Organisation	Comment	Attached documents
Aberdeen Standard Investments		<p>As the Council is aware, GL Hearn acts on behalf of Aberdeen Standard Investments (ASI), which manages the Phoenix Life Fund, owners of the Old Mill Road site.</p> <p>The introduction to the Issues & Options document (I&O) sets out that the role of the proposed new NSC Local Plan (LRP) is to identify sites for development to deliver the homes and employment need identified by the Joint Strategic Plan (JSP), notwithstanding that the JSP is not yet adopted and is currently at Examination.</p> <p>Section 5: Urban Living A principle of development promoted by the JSP is 'urban living'. Part 5 of the I&O recognises that urban living is a "central plank" of the JSP and "commands a high degree of public support and is a highly sustainable element of the [JSP] strategy".</p> <p>ASI supports the concept and sustainability principles of Urban Living.</p> <p>However, we do not consider it is appropriate or consistent for only Weston-super-Mare to be identified as suitable for 'urban living' development. The potential of Portishead and Clevedon to "contribute significantly to delivering the urban living agenda", is recognised at page 89 of the I&O under 'Flood Risk', but there is no reference to these towns within the urban living section and no target number of homes are 'allocated', other than 1000 at Weston-super-Mare. Ignoring the potential of other NSC settlements that may make a positive contribution to housing needs and the sustainability of settlements by the (re)development of brownfield sites for higher density development, will artificially limit the development potential within existing settlements and put additional development pressure on less sustainable locations to accommodate development needs.</p> <p>In our view (and consistent with the approach taken by other JSP authorities) the potential of NSC's main town settlements, including Portishead, to contribute to the 'urban living' objectives of the JSP should be recognised and taken forward as part of the Local Plan 2036 process (and the JSP if necessary).</p>	
Alex Child	The Planning Bureau Ltd	<p>In general terms, Option 3 is recommended as this accords closely with policy of the revised NPPF. Strategic Allocation sites will have their own bespoke requirements in this regard.</p> <p>Whatever option is pursued, there should be recognition that different forms of development may be delivered at a higher density without causing harm and that therefore density should be applied as a guide and not an instrument of Development Management used to prevent development that does not accord with it. The role that Retirement Housing can play in increasing densities should be recognised and supported.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	A combination of 1 & 3 should be used to create policy.	
Avon Wildlife Trust	Avon Wildlife Trust	We support the principle of sustainable intensification, so long as high quality green space is available to residents and site level green infrastructure principles are promoted.	
Blagdon PC	Blagdon Parish Council	We find it difficult to choose between options 2, 3 and 4, all of which have distinct benefits, but tend towards options 3 or 4.	
British Horse Society	British Horse Society	Whilst the remit of the BHS tends to cover the more rural areas of the district, there is one area where it would be possible to make improvements in planning. Whatever density of dwelling NSC settles on for this type of area, the higher the density, the greater the traffic and if NSC is serious about getting people out of cars, there needs to be a huge push to make cycling and mobility vehicle use within the towns safer. This argues for far greater use of shared cyclist and walker pavements. However, many elderly people are concerned about this, and many cyclists use pavements when they shouldn't. The BHS suspects the only way to get round this is to make sure that signage regarding which pavements can and can't be used by all groups is crystal clear, and possibly by greater use of 'lane' markings. Without this, cyclists will be put off using bikes because of the traffic, and residents will be nervous of using pavements to walk and use mobility vehicles. By the same token, parking on pavements should be much more actively discouraged. This should be an easy win in respect of NSC's task of encouraging healthy lifestyles.	
Burrington Parish Council	Burrington Parish Council	Prescriptive approaches that include setting minimum densities are unlikely to be appropriate and may impede implementation. More variety should be encouraged in sizes and types of site and approaches to development to meet demands for different kinds of housing and to encourage a wider range of builders.	
C Twine		<p>Urban Living</p> <p>4.21 The Council's Urban Living strategy is focussed on maximising densities in all locations, alongside a more specific approach to delivering higher densities at Weston-super-Mare.</p> <p>4.22 We are generally supportive of any approach that seeks to maximise the efficient use of land in sustainable locations. We would, however, be mindful of any approach which seeks to establish minimum densities for individual towns or as part of a site allocations process due to the fact that unforeseen technical issues might not mean this is possible. Flexibility would need to be built into any proposed policies to allow for lower densities to be achieved on sites where there are clear reasons for doing so.</p>	
Clevedon Town Council	Clevedon Town Council	Revisit the potential for brown field sites, especially for the use of affordable housing/starter homes accommodation.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Congresbury Parish Council	Congresbury Parish Council	We disagree there should be changes in density within villages both service and infill. This policy should be restricted to just towns and cities as intended by NPPF. The options presented all seem very similar with an increasing granular with the options. Option 3 seems sensible but aspects of option 1 and 2 should also be included and we would favour a combined approach to ensure higher densities are restricted to truly towns, not villages. This needs further clarification.	
Ecomotive Ltd		<p>We do not have a strong view on the most appropriate model to determine density at different sites. However we would like to emphasise the opportunities offered by community-led housing schemes to deliver homes at higher densities, because of the enhanced ability of such schemes to encourage residents to share both indoor and/or outdoor spaces and to generate strong and cohesive communities within such developments. This can have further positive outcomes such as improved physical and mental health, reduced loneliness and isolation, improved environmental performance through sharing of resources between residents, greater engagement in the local community and provision of higher levels of affordable housing than are typically achieved through conventional developer-led schemes, which usually seek to drive affordable provision to a minimum.</p> <p>Therefore we recommend the allocation of a % of specific regeneration sites within urban areas to CLH and/or self build, which will enable these groups to start delivering schemes with minimal delay.</p>	
EWB	Edward Ware Homes	<p>Urban Living</p> <p>4.15 The Council's Urban Living strategy is focussed on maximising densities in all locations, alongside a more specific approach to delivering higher densities at Weston-super-Mare.</p> <p>4.16 We are generally supportive of any approach that seeks to maximise the efficient use of land in sustainable locations. We would, however, be mindful of any approach which seeks to establish minimum densities for individual towns or as part of a site allocations process due to the fact that unforeseen technical issues might not mean this is possible. Flexibility would need to be built into any proposed policies to allow for lower densities to be achieved on sites where there are clear reasons for doing so.</p>	
Gladman Developments Ltd	Gladman Developments	Gladman support the efficient use of land and the need to maximise the reuse of brownfield land where appropriate. However, the Council need to ensure that the strategy is deliverable in a viable and policy compliant manner. A blanket approach to densities would not be an appropriate response to this issue and would be unlikely to provide the wide variety of housing typologies required to meet overall housing needs of different sectors of the community.	
GVA Grimley	GVA Grimley	St Modwen seeks clarification that the proposed minimum densities wouldn't be applied to the existing Weston Villages sites such as Locking Parklands and former Moss lands as increased densities are challenging to deliver here. This is due to market demand being primarily for family dwellings and site specific constraints including significant tree coverage and policy requirements including car parking standards which have a significant bearing on site density.	
Hallam Land Management Ltd (David Lock Assoc)		The overarching aim of urban intensification within higher tier settlements is a commendable and inherently sustainable notion carried forward from the WoEJSP submission document. HLM do, however, consider that the policy options presented merely serve to demonstrate that it will be very difficult to ensure the effectiveness of such a policy for the following reasons:	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>- Option 1 (setting of minimum densities) is a tried and tested density policy that has not resulted in transformational density uplifts across the country for the same reasons as stated in the consultation document.</p> <p>- Option 2 (setting of minimum densities on allocated sites) would certainly achieve higher densities on selected sites, however the number of suitable allocated sites within the top tier settlements themselves is likely to be low, thus resulting in a low absolute number of units coming forward under this initiative. Furthermore, it would not cover any urban windfall sites which (arguably) should be the priority sites for this policy.</p> <p>- Option 3 (defined higher density areas around transport hubs and service centres) is problematic for the reasons stated in the consultation document; that it does not necessarily correlate with available development sites.</p> <p>- Option 4 (masterplan-led approach to density) is considered by HLM to be the only implementable option that would contribute towards a positive, plan-led development strategy, and is the most likely to see real results at a meaningful scale. A masterplan approach to density allows a site-specific approach that supports opportunities for new development to align with new infrastructure projects, as part of a more conscious, infrastructure-led approach to growth which has longer-term, and therefore more sustainable, credentials than an approach that seeks to retrospectively increase densities around existing transport hubs which might not necessarily be served by sufficient education infrastructure or community facilities.</p> <p>Pursuant to Option 4, the Land East of Clevedon provides a unique opportunity to masterplan a mixed-use sustainable community with new housing provide alongside employment provision and education and community infrastructure supported by a sustainable transport network as well as opportunities to deliver more strategic network improvements of benefit to the wider growth and infrastructure projects along the Clevedon – Nailsea - Backwell – Bristol corridor.</p>	
Hayes Family and Mr Cope		<p>JSP seeks to deliver 1,000 dwellings from an ‘urban living’ component of the supply. This has been calculated by NSC in the following way:</p> <p>CATEGORY ESTIMATED CAPACITY Additional capacity from allocated sites 364 Additional capacity from sites with permission but not allocated 34 Likely development 263 Trend analysis non-site specific 351 Total likely in Plan Period from Weston-super-Mare 1,012 Requires Intervention 1,500</p> <p>The Issues and Options Document states: ‘the analysis shows that it is feasible to meet the additional 1,000 JSP urban living capacity’. We do not agree with this assertion - whilst this may be appropriate in areas such as Bristol where there are constant regeneration opportunities, we fail to see how this will be delivered in NSC.</p> <p>5.27 To date, we have not seen any detailed analysis of how these figures have been derived and it is our view that without allocating sites to meet this figure this is simply a way of rebranding further windfall development. Before commenting further on these figures we suggest that the Council publishes these with a detailed analysis and how each policy option would meet the minimum target of 1,000 dwellings. In particular the ‘requires intervention’ category which sets out an additional supply of 1,500 homes is not explained at all and it is impossible to comment on where these figures have come from and how they are justified.</p> <p>5.28 In order for the system to be plan-led, we suggest that the 1,000 dwellings from the ‘urban living’ component of the JSP should be incorporated into ‘non-strategic growth’ and NSC seek to allocate enough non-strategic sites (sites below 500 dwellings) to meet a minimum target of 2,000 dwellings over the plan period in order to keep a rolling supply of housing land and provide competition and flexibility in the market for land.</p> <p>5.29 Of the four options presented as part of the Issues and Options document, we consider that a mix of Option 2 and Option 3 would be appropriate in order to try and achieve minimum densities on allocated sites as well as improving transport hub areas which are already sustainable. We would agree that if Option 2 is pursued, flexibility would need to be built into the policies to reflect unforeseen or changed circumstances. One disadvantage noted is that not all issues may be found at the time of allocation but we would contend that should the authorities select deliverable sites which have presented appropriate levels of technical evidence during the plan process, reasonable assumptions can be made regarding the density of sites in these areas.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>5.30 One other issue raised with Option 2 is that ‘large windfall sites’ would not be covered by the minimum density requirements. Given that this is meant to contribute to the ‘urban living’ supply of over 1,000 dwellings we consider that this is a critical issue and needs to be addressed. This could easily be rectified by allocating sites instead of relying on an unknown and unidentified supply coming forward. Not specifically selecting sites is the antithesis of planning; it provides no certainty where development should take place and a Local Plan should clearly be providing such assurances.</p> <p>Furthermore, there is no clear direction that all four options will be able to fully contribute to the minimum of 1,000 dwellings and evidence needs to be provided on this matter before the plan progresses any further.</p>	
Hayes Family and Mr Cope		<p>6.0 CONCLUSION</p> <p>6.1 As set out in the preceding sections of this statement we have concerns over the elements of housing supply the Council have set out within the Issues and Options document. In particular we are concerned with the ‘urban living’ component and how these figures have been justified with no evidence.</p> <p>6.2 We are of the opinion that ‘urban living’ seems to be another way to re-brand windfall development which in our view is the antithesis of planning and instead these 1,000 dwellings should be allocated on sites of under 500 dwellings as part of the non-strategic growth supply. This would bring the amount of dwellings to be allocated as non-strategic growth up to a minimum of 2,000. Without allocating these additional dwellings under non-strategic growth we fail to see how the Council will plan for future development and supply in the district. This is a key issue and needs to be rectified as soon as possible as the plan progresses.</p> <p>6.3 As part of this revision we would suggest that land west of the M5 is allocated for up to 110 dwellings in the preferred options stage of the Local Plan Review, to contribute to nonstrategic growth. The site is highly sustainable and significant evidence has already been provided within the application to demonstrate the site can be developed without any adverse effects and can begin delivery within the next five years. Following the submission of our evidence we would urge the Council to re-consider their assessment of the site and put forward this land as an option for development in the next stage of the plan-making process.</p> <p>6.4 We look forward to seeing the next stage of the plan process and land west of the M5 being considered as an option for development.</p>	
Highways England	Highways England	<p>Urban Living</p> <p>Section 5 of the I&OD considers Urban Living. This concept was introduced in the JSP, and is described further in Section 5. At present, there is a focus on ensuring an appropriate density of development in town centres and transport hubs, particularly in Weston-super-Mare town centre and along the A370 corridor, to maximise self-containment. Highways England supports the principles of Urban Living. The JSP evidence base (November 2018) describes the methodology used to assess the trip generation from Urban Living and concludes that the trip generation is about half that expected from the SDLs ,(although a number of assumptions in the assessment remain unclear). The JSP evidence base (November 2018) sets out the characteristics of urban living locations (higher housing densities (including flats), constraints on private vehicle use (parking provision and ease of travel by car) and better access to public transport), to justify the lower trip generation from the Urban Living allocations. It is therefore anticipated that these characteristics will be brought into policy through reduced car-parking standards and any intended covenants placed on properties to manage car ownership. We note that the Urban Living allocation area for Weston-super-Mare covers the existing urban area, including the Worle area, which is located close to M5 Junction 21. It is assumed that the policies applied to development covered by the Urban Living allocation will be universal, not matter where the development is located in the Page 7 of 8 allocation area. If this is not the case, the assessment of impact undertaken to identify the JSP mitigation, which follows through to this Plan, may not be sufficient to accommodate the trip generation from the allocation.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Home Builders Federation Ltd (S Green)	Home Builders Federation Ltd	<p>The HBF is supportive of the efficient use of land but the WoE JSP assumption for 1,000 additional dwellings from predominantly Weston Super Mare over and above opportunities identified in the adopted Site Allocations Plan should be fully justified by robust evidence. The setting of any density standards in the new Local Plan should be undertaken in accordance with the 2018 NPPF (para 123). In the circumstances of an existing or anticipated shortage of land for meeting identified housing needs then a minimum density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate as proposed under Option 3. However blanket approaches to minimum densities across parts of the District (Option 1) and allocated sites (Option 2) may be inappropriate and unlikely to provide a variety of typologies to meet the housing needs of different groups. The inter-relationship between density, house size (including any implications from the introduction of optional Nationally Described Space Standards and / or accessible / adaptable homes standards), mix and developable acreage on viability should also be carefully considered especially if Options 1, 2 and / or 4 are pursued by the Council.</p> <p>If the Council wishes to adopt any of the higher optional technical standards for housing as policy requirements then this should only be done in accordance with the 2018 NPPF (para 127f & Footnote 42). The Written Ministerial Statement (WMS) dated 25th March 2015 stated that "<i>the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG</i>". The Council should comply with the criteria set out in the NPPG.</p>	
Homes England	Homes England	<p>In response to you're the public consultation Homes England wishes to comment briefly on the Consultation's potential impact on the Agency's land holdings in Weston-super-Mare. We note the Council's comments on and vision for 'Urban Living', excluding an explicit drive for higher town centre urban densities. Where / if target densities are adopted these should be capable of acknowledging that site specific constraints, other Council policies and other considerations may genuinely impact the level of viable density achievable. Any 'yardstick' should therefore be realistic and flexible in that regard.</p>	
J Gower-Crane		<p>(5. Urban Living) Until the NPPF emphasis on efficient land use and 'use of minimum density standards' and brownfield sites has been put in place infill settlement boundaries such as Bleadon's should not be reviewed or changed. Focus seems to be on development and return on investment rather than local need.</p> <p>'up not out' does not seem to have been applied to the new housing around WSM, which surely would have created a greater density in an urbanised area that would reduce the pressure on surrounding villages?</p>	
jerb44		<p>Nothing wrong with high density housing provided a sophisticated and wide ranging public transport system is integrated into the development. Nothing presented here suggests that such a transport system is either envisaged or affordable.</p>	
Lands Improvement		<p>URBAN LIVING</p> <p>8.1 The Council's Urban Living strategy is focussed on maximising densities in all locations, alongside a more specific approach to delivering higher densities at Weston-super-Mare.</p> <p>8.2 We are generally supportive of any approach that seeks to maximise the efficient use of land in sustainable locations. We would, however, be mindful of any approach which seeks to establish minimum densities for individual towns or as part of a site allocations process due to the fact that unforeseen technical issues might not mean this is possible. Flexibility would need to be built into any proposed policies to allow for lower densities to be achieved on sites where there are clear reasons for doing so.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Local Access Forum	Local Access Forum	<p>Whilst the remit of the LAF tends to cover the more rural areas of the district, there is one area where it would be possible to make improvements in planning. Whatever density of dwelling NSC settles on for this type of area, the higher the density, the greater the traffic and if NSC is serious about getting people out of cars, there needs to be a huge push to make cycling and mobility vehicle use within the towns safer. This argues for far greater use of shared cyclist and walker pavements. However, many elderly people are concerned about this, and many cyclists use pavements when they shouldn't. The LAF suspects the only way to get round this is to make sure that signage regarding which pavements can and can't be used by all groups is crystal clear, and possibly by greater use of 'lane' markings. Without this, cyclists will be put off using bikes because of the traffic, and residents will be nervous of using pavements to walk and use mobility vehicles. By the same token, parking on pavements should be much more actively discouraged. This should be an easy win in respect of NSC's task of encouraging healthy lifestyles.</p>	
Matt Griffith	Business West Chambers of Commerce and Initiative	<p>We also welcome the continued focus on urban regeneration and urban living for Weston Super Mare. Weston Super Mare has seen significant progress in urban regeneration and in attracting greater level of investment, more city centre homes and a better cultural and leisure offer. We want to see this continue and welcome the plan's ambitions to continue with this focus within North Somerset's broader development ambitions.</p>	
Mead Realisations Ltd		<p>The suggested approach to increasing urban living is unlikely to deliver the level of growth required up to 2036.</p> <p>2.33. It is not clear what is meant by significantly increasing densities. The ability for an additional 1,000 dwellings to be delivered from urban living is questioned and it is not clear what densities will be required to achieve this aim. Page 62 of the Issues and Options makes reference to the existing approach contained within the Adopted Core Strategy which targets 40 dwellings per hectare across North Somerset. To provide some context to the suggestion that densities can be increased the Council should clarify whether the current approach has been successful.</p> <p>2.34. The table at page 63 appears to be based on capacity work undertaken by the Council although this evidence has not been made available. There is no explanation as to what is meant by trend analysis non-site specific. It is also not clear how the further capacity from sites 'requires intervention' has been assessed.</p> <p>2.35. The Council's current design guidance will need to be carefully reviewed if higher densities are to be achieved.</p>	
N Cooper	Claverham Future	<p>Higher density developments close to employment and facilities are an essential part of modern planning (actually always have been). They cannot be remote from major employment hubs. They must be affordable to the employees, so survey and make compatible.</p>	
Nailsea Town Council	Nailsea Town Council	<p>Housing densities on all sites should be determined by strategic considerations, local characteristics and reflect the needs of the housing mix. Sufficient parking spaces, reflecting a realistic assessment of the demand, should be provided.</p>	
Natural England	Natural England	<p>The urban living approach should help to ensure land is used efficiently and reduce the need to travel by private car, it will however result in an increase in the use of, and pressures on, existing parks and green spaces. The importance of providing high quality green space and access opportunities close to where people live is recognised for the wide range of benefits it provides for people and society; it can also help to reduce recreational pressures on sensitive sites. We would expect the enhancement and suitable management of urban parks and green spaces to be a priority for the North Somerset Local Plan and for the WoE GI Plan.</p>	
Newland Homes	.	<p>6.1.1 The suggested approach to increasing urban living is unlikely to deliver the level of growth required up to 2036.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>6.1.2 It is not clear what is meant by significantly increasing densities. The ability for an additional 1000 dwellings to be delivered from urban living is questioned and it is not clear what densities will be required to achieve this aim. Page 62 of the Issues and Options makes reference to the existing approach contained within the Adopted Core Strategy which targets 40 dwellings per hectare across North Somerset. To provide some context to the suggestion that densities can be increased the Council should clarify whether the current strategy has been achieved.</p> <p>6.1.3 The table at page 63 appears to be based on capacity work undertaken by the council although this evidence has not been made available. There is no explanation of what is meant by trend analysis non-site specific. It is also not clear how the further capacity from sites 'requires intervention' has been assessed.</p> <p>6.1.4 The Council's current design guidance will need to be carefully reviewed if higher densities are to be achieved.</p>	
Pegasus (D Millward)	Pegasus Group	<p>Urban Living (page 62)</p> <p>2.25 The Council's Urban Living strategy is focussed on maximising densities in all locations, alongside a more specific approach to delivering higher densities at Weston-super-Mare. The ambition is to deliver 1,000 dwellings through regeneration and intensification of land uses within settlements across the district generally, albeit Weston-super-Mare will be expected to deliver the vast majority of development.</p> <p>2.26 This focus on Weston-super-Mare means that additional land for housing around the edge of the town is highly unlikely to come forward. Indeed, the intention appears to be for Weston-super-Mare's housing needs to be met through the Urban Living process and existing commitments. In short, Weston-super-Mare does not appear to be expected to contribute to the residual target set by the JSP.</p> <p>2.27 We are generally supportive of any approach that seeks to maximise the efficient use of land in sustainable locations. We would, however, be mindful of any approach which seeks to establish minimum densities for individual towns or as part of a site allocations process due to the fact that unforeseen technical issues might not mean these are achievable. Flexibility would need to be built into any</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>proposed policies to allow for lower densities to be achieved on sites where there are clear reasons for doing so.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>We recognise the JSP and the Local Plan prioritise the concept of urban living to maximise the potential of urban areas through urban intensification. In reality that means Weston-super-Mare in the case of North Somerset. Whilst the towns of Clevedon, Nailsea and Portishead are undoubtedly urban, they with only have limited potential for urban intensification like Bristol and Weston-super-Mare, without there being severe impacts on their character or further loss of employment land. However, recognising that the urban areas are the most sustainable places to live, we consider the plan should have considered options for opportunities for urban extension at Weston-super-Mare, Clevedon and Portishead, as well as the urban extension proposed for Nailsea.</p> <p>The Issues and Options document then sets out options for increasing housing in towns through density policies. If the Council use density policies they should be supported by appropriate evidence. The starting point should be a review of existing policies to show whether or not they are effective. These are Core Strategy Policy CS14, which sets a target density of 40 dph, but allows higher densities at accessible locations and in less sensitive areas. Development Management Plan Policy DM36 sets out criteria to be applied in determining the appropriate density of a site in optimising its potential to accommodate development whilst protecting the distinctiveness and character of the area.</p> <p>In our view combining these two policies would be an appropriate approach, because it retains the continuity of the existing policies, sets a realistic target density and provides criteria which enable the density of each site to be assessed on its own merits. Further advice on the appropriate criteria for such policies is set out in paragraph 122 of the NPPF.</p> <p>In view of the above, we support strategy to increase densities on larger sites in Weston-super-Mare. In that respect an assessment of the undeveloped parts of Haywood Village indicates the potential to provide up to 150 additional dwellings through increased densities.</p>	
Portishead Town Council	Portishead Town Council	Support option 3	
Simon		<p>Rather obviously increased urban living imposes decreased rural living so the plan is striving to impose a change of character on the region and on those already living there.</p> <p>In the case of our region there is the added issue that the current drainage solutions barely cope with past rainfalls. Increased housing with increased density will increase flooding risk very substantially. Climate change is very likely to bring increased rainfall and, more importantly, increased periods of torrential rainfall. It is unlikely that <i>local</i> drainage solutions will cope without substantially increased conduits to the Bristol Channel to take away the waters that previously would have soaked into farmland.</p>	
Taylor Wimpey - The Vale		<p>Q27. Urban Living</p> <p>1.23. The response to this question should be read in conjunction with our response to the Strategic Housing Land Availability Assessment at Section 2 of these representations.</p> <p>1.24. The term 'Urban Living' is also drawn from the emerging JSP, and in principle we have no objection to the concept of higher density development on previously developed land in accessible and sustainable urban locations.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>1.25. We do, however, have a concern regarding the extent of reliance on 'Urban Living' in Weston-super-Mare as a source of housing supply and the evidence to back this up. Page 63 of the consultation document identifies the potential for 1,012 dwellings from Urban Living with a potential further 1,500 via "intervention".</p> <p>1.26. Firstly, despite quoting the figure of 1,012, there is absolutely no evidence of how these figures have been arrived at (ie a list of sites), nor is there any explanation of what "intervention" constitutes. This prevents any scrutiny from interested parties and renders this element of this consultation futile.</p> <p>1.27. Secondly, and as discussed again below in Section 2, there is also a separate allowance for windfall sites, which could be construed as double counting, particularly given the lack of evidence.</p>	
Tom Leimdorfer		The 'urban living' figure of 1,000 seems unambitious. I am aware of current difficulties in encouraging development near the town centre on sites already allocated. However, government policies can change and attractive, sustainable intensification of Weston Town Centre would be desirable. There may also be opportunities for 3 to 5 story development with attractive landscaping and communal gardens some older low quality housing further from but well connected to the town centre.	
Tom Leimdorfer		A combination of Options 3 and 4 could deliver a more ambitious target for the number of dwellings, particularly towards the second half of the plan period.	
Wainhomes		<p>2.17. The suggested approach to increasing urban living is unlikely to deliver the level of growth required up to 2036.</p> <p>2.18. It is not clear what is meant by significantly increasing densities. The ability for an additional 1,000 dwellings to be delivered from urban living is questioned and it is not clear what densities will be required to achieve this aim. Page 62 of the Issues and Options makes reference to the existing approach contained within the Adopted Core Strategy which targets 40 dwellings per hectare across North Somerset. To provide some context to the suggestion that densities can be increased the Council should clarify whether the current approach has been successful.</p> <p>2.19. The table at page 63 appears to be based on capacity work undertaken by the Council although this evidence has not been made available. There is no explanation as to what is meant by trend analysis non-site specific. It is also not clear how the further capacity from sites 'requires intervention' has been assessed.</p> <p>2.20. The Council's current design guidance will need to be carefully reviewed if higher densities are to be achieved.</p>	
WENP	West of England Nature Partnership	We support the principle of sustainable intensification, so long as high quality green space is available to residents and site level green infrastructure principles are promoted, for example food growing spaces, green walls and green roofs.	
Weston Town Council	Weston-super-Mare Town Council	Weston-super-Mare Town Council strongly believes that future development, including the town centre but particularly in outer areas of Weston and adjoining parishes, must not be of too high a density just because Weston is a town. Mistakes have been made in the past and the Town Council believes that further development should be lower density. Good quality and design are vital; and new policies must do more than in the past to ensure this.	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	The advantages and disadvantages for the options have been clearly expressed and are agreed.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The following comments from the published feedback from the Nailsea Urban Extension Workshop held on 20 November 2018 are agreed:</p> <p>? That there will be a genuine mix of housing types and tenures including more affordable homes for young people and young families.</p> <p>? The Elms has a mix of housing styles, has social housing and play areas – good example of mix of housing types and tenures.</p> <p>? Need to have different developers so there is a diversity of design.</p> <p>? It is important to have green space that is easy to access. A main attraction of North Somerset is the ease of access to beautiful countryside.</p> <p>? Fear that the new development would create ‘urban sprawl’ which would make access to the countryside more difficult.</p> <p>? Need a local centre/central community meeting space in new development as a focal point; this should be built at the beginning.</p> <p>It is recommended that consideration should be given to the examples of greenfield developments shortlisted for RIBA awards with appropriate facilities. For these reasons Option 4 is preferred.</p>	
Wrington Parish Council	Wrington Parish Council	Option 3 preferred. Regarding Option 1, please do not under any circumstances set minimum densities for villages (unless this text refers to Weston villages). Use the vernacular to maintain and respect the local character in each case.	
Wrington Village Alliance		support option 3. Locating denser development at sustainable transport hubs should be a principal aim of development.	
Wrington Village Alliance		support option 3. Locating denser development at sustainable transport hubs should be a principal aim of development.	
wwarden		It seems to me that the suggested ‘disadvantages’ shown under Option 4 are too negative when this should be the preferred policy approach. I support Option 4.	

Document Part Name

Q28. Are the principles and priorities set out in the SPD still the right ones for the town centre?

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	Yes.	
Avon Wildlife Trust	Avon Wildlife Trust	No comment	

Respondent Name	Respondent Organisation	Comment	Attached documents
Blagdon PC	Blagdon Parish Council	We have no specific comments but agree that they are still valid.	
Congresbury Parish Council	Congresbury Parish Council	We favour better regeneration of Weston Town Centre so support in principle the details set out in this consultation.	
Homes England	Homes England	In response to you're the public consultation Homes England wishes to comment briefly on the Consultation's potential impact on the Agency's land holdings in Weston-super-Mare. We support the Council's aspiration for qualitative and perception improvements to Weston-super-Mare town centre.	
Wrighton Parish Council	Wrighton Parish Council	Yes.	

Document Part Name Q29. What other steps could be taken to deliver and accelerate town centre regeneration?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex		see below	
Aston	Aston and Co UK	NSC should commission a master plan containing place making ideas and set a Rochdale Envelope . That would guide developers/planners in terms of what is achievable and attract investment to implement/deliver it.	
Avon Wildlife Trust	Avon Wildlife Trust	No comment	
Blagdon PC	Blagdon Parish Council	We have no comments to make.	
Wrighton Parish Council	Wrighton Parish Council	Free car parking on streets, properly controlled by limiting time stays (eg 1 hour) to encourage shoppers into the town. Metering on-street parking has contributed to the greatest downturn in footfall to shops within the town centre and is universally hated.	

Document Part Name Q30. Do you have any views on the opportunities and challenges of achieving good quality urban intensification within this area?

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	Yes NSC need a master plan/place making plan commissioned by NSC to guide the solution.	
Avon Wildlife Trust	Avon Wildlife Trust	No comment	
Blagdon PC	Blagdon Parish Council	We have no comments to make.	
N Cooper	Claverham Future	No intensification should occur without demonstrable local need. Which direction will the traffic be to facilities and work? Improvements to increase business viability is a good idea. Make sure employment needs/salaries match housing affordability or new housing will create further issues.	
Tom Leimdorfer		Holistic planning of the A370 corridor is long overdue and the list of issues and aims provides a good starting point.	
Wrighton Village Alliance		A370 - The issues quoted are not the main issues: development must have a viable sustainable travel solution and this must be a fundamental issue that must be included.	

Document Part Name Q31. Do you agree that the list above sets out the main issues for the future development of the area in question?

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	Yes.	
Avon Wildlife Trust	Avon Wildlife Trust	No comment	
Blagdon PC	Blagdon Parish Council	The list appears comprehensive.	
Wrighton Parish Council	Wrighton Parish Council	Yes.	

Document Part Name Q32. Are there any key issues or opportunities that have been missed?

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	<p>The A370 corridor from the M5 into central Weston requires careful planning and a design brief. It is a long haul by car and needs to generate a warm welcome to the Town and capture people's interest by a careful mix of land use, good design and clever Place Making.</p> <p>Existing approach to density – the proposed target density across North Somerset of 40 dwellings per hectare (dph) adjusted by consideration of accessibility and sensitivity of location is agreed. For urban (city centre) locations height parameters would be helpful. How will that be dealt with? A indicative zoning plan would be helpful.</p>	
Avon Wildlife Trust	Avon Wildlife Trust	No comment	
Blagdon PC	Blagdon Parish Council	We have no specific suggestions to make.	
Ecomotive Ltd		We consider that community-led delivery and ownership (including self build and custom build) are vital elements in creating vibrant and attractive new neighbourhoods within this area and should form a key component of any new development. Specific plots or % allocations for these types of project should therefore be included within the masterplan framework.	
Environment Agency	Environment Agency	Increased Urban Living in Weston super Mare – There should be less vulnerable uses at ground level, or no sleeping accommodation on the ground floor e.g. duplex/ maisonettes.	
South West Strategic Developments (SWSD)		<p>POTENTIAL RESIDENTIAL SITE – EXTENSION TO PREVIOUSLY APPROVED SITE KNOWN AS 'LAND NORTH OF OLD MIXON ROAD' (REF: 16/P/0150/O)</p> <p>Urban Living: Intensification of Existing Sites In respect to the intensification of existing sites, the appeal decision connected to 16/P/0150/O restricted the site to 'up to 130 dwellings' in response to landscape evidence and the master planning exercise undertaken in the run up to the appeal. However, at that time the master planners for the site assumed a fairly large proportion of the site would accommodate large semi-detached and detached houses. Since the appeal was determined developers have provided bids to buy this land, all of these have been based on using the site for small scale family housing with more terraces resulting in a higher density of development. This has identified that the capacity of the area within the site that was deemed suitable to accommodate housing is actually circa 30 dwellings higher than initially anticipated.</p> <p>We would ask that the council consider this if the option to specifically allocate sites adjacent to Weston's boundaries is pursued. By that time further planning applications for this site should have clarified the potential increase in capacity in more detail.</p>	South West Strategic Developments Appendix 1 - 161206 13191 1000D Redline Plan.pdf (3.7 MB) South West Strategic Developments Appendix 2 - 13191 3001E Illustrative Framework Plan.pdf (6.3 MB)

Document Part Name

Q33. Do you agree that the delivery of employment and employment premises remain important to Weston-super-Mare?

Respondent Name	Respondent Organisation	Comment	Attached documents
Abbots Leigh Parish Council		<p>Although not a major employment area the NPA has significant business sites – the Eden Business Park (over 40 businesses), The Old Brewery Business Centre (15 businesses) as well as the Manor Nursing Home in Abbots Leigh (78 jobs) and Leigh Court (185 jobs). The Pill precinct is a district retail centre whilst there are other employment sites (e.g. Brackenwood Garden Centre). Almost 200 people work from home.</p> <p>We welcome the application of planning rules which allow/encourage working from home, as well as support for businesses which offer local jobs. Encouragement should be given to local retail centres. If there is further growth at Royal Portbury Dock which generates employment that is welcome although we are also concerned about the growth of traffic.</p>	
Aberdeen Standard Investments		<p>Given the significance of economic growth as an overarching objective of sustainable development as set out by the NPPF, we consider it is vitally important that the Local Plan 2026 and its evidence base is clear and unambiguous about what constitutes ‘economic growth’ and how differing business types contribute to sustainable development and meeting employment needs.</p> <p>Similarly, the allocation of sites and the development of policies to guide economic growth, should have regard to other factors, additional to the employment land need / capacity evidence (such as the ELR), including considerations such as the suitability of sites, particularly in the context of their location and ability to support broader economic, cultural and environmental objectives.</p> <p>SLI welcomes the commitment to revisit Policy SA4 of the Site Allocation Plan (SAP) and looks forward to commenting on revised draft policy at later stages of the LPR preparation process.</p>	
Aston	Aston and Co UK	Yes employment is critical at the larger settlements and everywhere where housing is located, or planned.	
Blagdon PC	Blagdon Parish Council	Given the size of Weston, the planned housing growth and the need to locate employment and housing as closely together as possible, this is a key principle to be maintained. This must be supported by coordinated efforts to improve transport connectivity, both public and private.	
British Horse Society	British Horse Society	The document rightly points out that there are pockets of employment right out in the countryside. We mentioned above the fact that horse riding employs large numbers of people across the district, and the number of cycling establishments is also on the increase. We estimate the horse population at approximately 5,500; at around £2,000 to keep a horse, this means that some £11m a year goes into the local economy (and probably rather more). This activity routinely employs large numbers of people. Unfortunately, because horses are generally no longer considered as 'transport', they simply get forgotten by planners; NSC needs to acknowledge and plan for the considerable contribution that horse owners make to the local economy and particularly the rural economy. Similarly, cycling is a growing activity that needs to be actively encouraged and could potentially employ more people.	
Congresbury Parish Council	Congresbury Parish Council	We would agree that employment should remain an important factor in Weston-super-Mare development. Without local employment, more pressure will be put on the M5 and A370. Both are struggling at peak times. We would like to see details of what businesses North Somerset Council would like to attract to the area and ensure the complement with Bristol through the Joint Spatial Plan.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	<p>Although not a major employment area the NPA has significant business sites – the Eden Business Park (over 40 businesses), The Old Brewery Business Centre (15 businesses) as well as the Manor Nursing Home in Abbots Leigh (78 jobs) and Leigh Court (185 jobs). The Pill precinct is a district retail centre whilst there are other employment sites (e.g. Brackenwood Garden Centre). Almost 200 people work from home.</p> <p>We welcome the application of planning rules which allow/encourage working from home, as well as support for businesses which offer local jobs. Encouragement should be given to local retail centres. If there is further growth at Royal Portbury Dock which generates employment that is welcome although we are also concerned about the growth of traffic</p>	
GVA Grimley	GVA Grimley	<p>St Modwen acknowledges the importance of aspiring to deliver employment led development in the Town. However the challenging market reality must be fully acknowledged in planning policy given the extent of potential employment sites and the reasonably low level of occupier interest. As one of the largest commercial developers in the UK St Modwen know from experience (nationally as well as locally) that speculative development only works in limited circumstances. Therefore the focus needs to be on creating the right environment to attract occupiers, whether that be through marketing and branding or providing serviced sites.</p> <p>We wish to comment on the approach of the Employment Land Review - ELR (summarised on pages 70 and 71) and the specific assumption (confirmed on page 71 of the Issues and Options document) that the current employment allocations would be maintained and rolled forward into the Local Plan taking into account findings from the ELR. St Modwen remains concerned that the Atkins ELR has not undertaken a robust analysis of the site to understand why the site remains undeveloped despite previous allocations and planning permissions. The listed constraints (page 79 of the ELR) give no considerations to the significant land surcharging and drainage requirements to bring the site forward. Furthermore there was no dialogue with St Modwen seeking to understand their position as landowner and developer.</p> <p>St Modwen has attempted to demonstrate to the Council through application submission that the land West of Kenn Road will not be delivered for employment development given the lack of strategic occupier demand which is required to open the site up for development. St Modwen has therefore presented a mixed use approach to development to facilitate any form of employment development in this location and we would want the Local Plan to consider such an approach to facilitate employment sites that are not being delivered.</p>	
Highways England	Highways England	<p>We welcome the recognition that there needs to be a strong emphasis on a robust strategy to deliver local employment opportunities, particularly at Weston-super-Mare, in order to reduce the need to travel and thus the pressure that outward commuting puts on the M5 and its junctions.</p> <p>The JSP sets out the overall scale of employment change to 2036 and a high-level strategy for the distribution of growth. We understand that in North Somerset, this distribution will focus on Weston-super-Mare, Bristol Airport and Royal Portbury Dock. With regards to Weston-super-Mare, we look forward to learning more about the proposed allocations, including their location, likely transport implications and any necessary mitigation proposals.</p>	
jerb44		<p>Most developments in North Somerset have required provision for business units. These have not been enthusiastically taken by businesses for many reasons but commonly because they are too remote. No evidence has been presented to show that the proposed housing developments although large would be large enough to sustain significant numbers of business units. There is therefore a significant and unmitigated risk that excessive and unsustainable amounts of commuting will result.</p>	
KMH1		<p>Yes, but you are not getting close to the scale of jobs needed locally to avert a commuter pollution nightmare on Bristol's doorstep.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Local Access Forum	Local Access Forum	<p>The document rightly points out that there are pockets of employment right out in the countryside. We mentioned above the fact that horse riding employs large numbers of people across the district, and the number of cycling establishments is also on the increase. We estimate the horse population at approximately 5,500; at around £2,000 to keep a horse, this means that some £11m a year goes into the local economy (and probably rather more). This activity routinely employs large numbers of people. Unfortunately, because horses are generally no longer considered as 'transport', they simply get forgotten by planners; NSC needs to acknowledge and plan for the considerable contribution that horse owners make to the local economy and particularly the rural economy. Similarly, cycling is a growing activity that needs to be actively encouraged and could potentially employ more people.</p>	
Mead Realisations Ltd		<p>Reference is made to the North Somerset Economic Plan. It is assumed that this refers to the refreshed version 2017-2036. This document should be added to the Council's evidence base for the new Local Plan.</p> <p>It is noted that the document was informed by an 'inclusive' process of consultation with key businesses and stakeholders in all stages of development. However, as a major employer in North Somerset Mead Realisations Ltd is disappointed not to have been included in this process.</p> <p>Reference is made to the need for the new Local Plan to have a clear economic vision. In accordance with the NPPF 2018 it should also include strategic sites, identify barriers to investment and be flexible and responsive.</p> <p>It is noted that an Employment Land Review has been prepared and was informed by consultation with relevant stakeholders at a workshop event and via telephone and email. However, as a major employer in North Somerset Mead Realisations Ltd are disappointed not to have been included in this process.</p> <p>Page 71 of the Issues and Options document suggest that additional employment sites will be considered. Land east of J21, as set out earlier in these representations, should also be considered for mixed use employment linked to the delivery of a bypass.</p> <p>To enable a proper understanding of the economic conditions in North Somerset the Council should set out how much land has been delivered so far since adoption of the Core Strategy in 2013.</p> <p>It is agreed that the delivery of employment remains an important issue for Weston super Mare. However, the allocation of employment land should not be constrained to land west of the M5.</p>	
Mr and Mrs Dobson		<p>The plan states '27. However, significant growth in this location will require the delivery of improved public transport access from Bristol and Weston-super-Mare'. Provision of public transport is a key aspect in many elements of the plan and will have a major impact on effective delivery. In Bleadon the local bus provision has now reduced to a very limited level of service, and is probably a reflection of the general provision across the area. A commitment to an integrated service across the area is appreciated but is it realistic?</p> <p>Developments in Information Technology and the provision of broadband and VPN connections to company systems have led to people being able to work from home and have also reduced the need to travel to meetings. Opportunities to share office space and rent on a short-term basis are also available. Such 'smart working' opportunities do not seem to have a high profile in the plan, but could possibly lead to a reduction in the need for Employment Land, and improve the soundness of the plan.</p> <p>Modifications suggested</p> <ul style="list-style-type: none"> • <i>Make stronger commitment to ring-fenced finance for the provision of an integrated transport system and ensure that it encompasses all communities.</i> • <i>Recognise the benefits of new technologies, smart working and innovative techniques to reduce the need for Employment Land.</i> 	

Respondent Name	Respondent Organisation	Comment	Attached documents
Taylor Wimpey - The Vale		<p>Q33. to Q37. Employment-led Strategy at Weston-super-Mare</p> <p>The response to these questions should be read in conjunction with our response to the Employment Land Review at Section 3 of these representations.</p> <p>The emerging Local Plan offers an opportunity to consider the approach to employment development afresh, particularly given that the existing strategy, has not been deemed a success. Yet, from the contents of the draft JSP, this consultation document and the accompanying Employment Land Review, it appears that the Local Plan is leaning toward the status quo, and not giving adequate consideration to locations where there is demonstrable market demand and good transport links.</p> <p>Indeed, this view is consistent with comments from Marcus Hewlett, Principal Planning Officer at the Bristol Chamber of Commerce Planning and Transport Meeting in October 2018, where, during a presentation on the consultation document, he stated that no significant change in the approach to the employment strategy was envisaged by NSC.</p>	The Vale - Local Plan Issues and Options Reps FINAL w appds.pdf (4.9 MB)
Weston Town Council	Weston-super-Mare Town Council	Weston-super-Mare Town Council believes it is vital that more land in the Weston area and adjoining parishes is set aside for job creation alongside new housing.	
Wrighton Parish Council	Wrighton Parish Council	Yes – in order to control/justify building of new homes.	
Wrighton Village Alliance		<p>Employment should remain important in Weston.</p> <p>Employment can be enhanced by having good sustainable transport links to areas of new housing proposed in the JSP. Housing should be focussed on those SDLs with good sustainable transport links to the centres of employment.</p>	

Document Part Name Q34. What do you think are the needs of current and future businesses that might want to operate in the town? What sort of premises and infrastructure do businesses need?

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	Flexible space on flexible terms is the emerging market. Start-up businesses want to be able to access suitable business accommodation on more flexible terms. Live-Work units provide unique opportunities in all NSC areas now fibre to the premises is rolling out.	
Blagdon PC	Blagdon Parish Council	In no order, they need access to labour, a variety of skills, a range of modern, affordable premises – factory units, warehouses, offices – to suit a diverse business community, good transport links to attract staff and ensure efficient distribution. Businesses in the modern economy also need efficient digital connectivity and this should be a priority.	
Congresbury Parish Council	Congresbury Parish Council	We believe good transport links for goods and services as well as commuters will be vital. Current peak hour traffic may discourage new businesses. Better rail links and easier links to Bristol airport would be required. By developing a housing strategy that attracts a young and educated workforce will encourage new businesses.	

Respondent Name	Respondent Organisation	Comment	Attached documents
GVA Grimley	GVA Grimley	The experience of St Modwen is ensuring a range of opportunities exist for occupiers, however an oversupply of land and premises will suppress values and make development unviable. Therefore a balanced approach needs to be taken. Within the Weston Villages the focus should be on providing some serviced land in the right locations rather than speculative new buildings. Furthermore a planning position needs to be presented that provides comfort to occupiers and developers that planning applications will be determined expediently.	
KMH1		Weston is largely retail and construction, now that most heavy industry has disappeared. There is an opportunity to turn the area into a tech hub because land could be cheaper than in Bristol, Plus. Or become an exemplar in sustainable living industry. Avoiding construction of legoland estates. And if any garden villages have to go ahead, use these as best practice examples to try out environmental features that are not driven by developer profit; e.g. natural flood attenuation, Suds, homes that recycle dirty water. Thus not high density and certainly below 25% density. But please, no unnecessary roads that on balance will damage the social fabric of existing settlements.	
Mead Realisations Ltd		If current and future business is to operate successfully access to the M5 will need to be improved as a matter of urgency through the delivery of the J21 bypass.	

Document Part Name Q35. What would help to attract more businesses to invest and grow here?

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	An improved entrance/gateway from the M5 along the A370 into town. Design matters.	
Blagdon PC	Blagdon Parish Council	In no order, they need access to labour, a variety of skills, a range of modern, affordable premises – factory units, warehouses, offices – to suit a diverse business community, good transport links to attract staff and ensure efficient distribution. Businesses in the modern economy also need efficient digital connectivity and this should be a priority.	
Bristol Port Company	Bristol Port Company	<p>This letter responds to the invitation by North Somerset Council (NSC) to comment upon their Local Plan 2036 - <i>Issues and Options Document</i> dated September 2018.</p> <p>We acknowledge that the West of England authorities are working together to prepare a Joint Spatial Plan, and each are required to review and update their local plans alongside the emerging JSP. The Bristol Port Company (BPC) has generic and specific concerns relating to the JSP and these are known to the West of England Combined Authority. A copy of our letter dated 10 January 2018 and identifying our concerns is attached.</p> <p>We respectfully remind you of BPC's role and the NPS for Ports before commenting on the <i>Issues and Options Document</i>.</p> <p>1. Our role: statutory undertaker and nationally-significant commercial port</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>We are the statutory harbour authority and competent harbour authority for the Port of Bristol and own and operate the commercial port of Bristol (Port) which comprises the Avonmouth, Royal Edward and Royal Portbury Docks (RPD), falling within the districts of Bristol City Council and North Somerset.</p> <p>The Port is recognised as a strategically important national asset, as well as having significant local and regional importance. It is a multimodal transport hub providing transit facilities for cargo with links by sea, road and rail to national and international destinations. We have consent under the Port of Bristol (Deep Sea Container Terminal) Harbour Revision Order 2010 (SI 2010/2020) to construct a deep-sea container terminal on the foreshore of the existing Avonmouth Docks. This project will cater for the largest container ships currently existing and will both secure and enhance the Port's ability to play its role as a key generator of economic growth for decades to come.</p> <p>The Port currently has a key role in the supply chain for EDF's Hinkley C nuclear power station. Cargoes delivered by road, rail and sea are stored within the dock before they are required on site and then taken by vessel to West Somerset.</p> <p>The Port links the Region and UK to the world with direct and feeder services for all freight needs and supports 9,000 jobs within the dock estate and almost 20,000 jobs across the UK.</p> <p>2. The National Policy Statement for Ports</p> <p>The National Policy Statement for Ports 2012 (NPS) confirms that <i>"the provision of sufficient sea port capacity will remain an essential element in ensuring sustainable growth in the UK economy"</i> (paragraph 3.1.4) and concludes that there is a <i>"compelling need for substantial additional port capacity over the next 20-30 years"</i> (paragraph 3.4.16).</p> <p>The NPS remains the most up to date statement of policy and has not changed with subsequent changes in Government. It summarises Government policy in the following terms:</p> <ul style="list-style-type: none"> • encourage sustainable port development to cater for long-term forecast growth in volumes of imports and exports by sea with a competitive and efficient port industry capable of meeting the needs of importers and exporters cost effectively and in a timely manner, thus contributing to long-term economic growth and prosperity; • allow judgments about when and where new developments might be proposed to be made on the basis of commercial factors by the port industry or port developers operating within a free market environment; and • ensure all proposed developments satisfy the relevant legal, environmental and social constraints and objectives, including those in the relevant European Directives and corresponding national <p>3. Issues and Options Document - Employment</p> <p>The Port is an international gateway for the West of England Region (and beyond) and acknowledged as a strategic employment location.</p> <p>The National Planning Policy Framework identifies economic growth as one of the overarching objectives to achieve sustainable development. We are pleased that the role of the Port is recognised in the <i>Issues and Options Document</i> with the associated need to accommodate growth but in developing the future Policies and Sustainability Appraisal, NSC must enable that development and expansion to take place beyond the Port's current boundaries.</p> <p>In relation to future development at Portbury, we have consistently objected to the assessment by NSC of our development needs at RPD, which are immediate and compelling. Our requirement for additional land today is acute and, put simply, at times of peak demand we have insufficient land to service the constantly increasing demands of our customers. We note that the development of land for employment provides direct and indirect jobs and income for local authorities through business rates.</p> <p>Since 2007, NSC has not made any further assessment of those development needs and, in particular, it has not reconsidered our needs following material changes to applicable policy, both under the NPS and also the National Planning Policy Framework (NPPF) (now July 2018). Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development and requires plans positively to seek out opportunities to meet development needs.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Shipway Farm (as shown on the enclosed plan) was acquired by us for the purposes of our undertaking. It is the only currently viable site adjacent to RPD capable of contributing to our future development needs and, to reflect the new policy requirements referred to above, it should be removed from the Green Belt and allocated for future port development.</p> <p>A new Local Plan should, as a minimum, therefore include the following policy:</p> <p><i>Land south-west of Royal Portbury Dock, at Shipway Farm, is identified as land allocated for uses associated with Royal Portbury Dock. Proposals for development of that area for port-related purposes will be permitted, subject to:</i></p> <ul style="list-style-type: none"> • <i>demonstrable need for that development that cannot reasonably be accommodated within the existing developed area at Royal Portbury Dock;</i> • <i>satisfactory environmental safeguards; and</i> • <i>there being no significant demonstrable harm to the amenities of residents of</i> <p><i>The land to remain open and safeguarded against any permanent form of development until such time as the need for port-related purposes is demonstrated.</i></p> <p>The land to be covered by the above policy should be that shown on the enclosed plan. Its allocation in the above terms would be congruent with the NPS, the NPPF and, of course, NSC's publicly stated key objective to maximise the role of the Port.</p> <p>In addition to the above, decisions as to the inclusion of other areas as strategic locations for non employment development must not be made without taking into account the Port's needs in the same areas; this is especially pertinent to the challenges that Portishead may face in the plan period.</p>	
Congresbury Parish Council	Congresbury Parish Council	Better infrastructure and incentives with business rates and taxes.	
Geoff Fox		<p>Create a centre of excellence for training and apprenticeships. Liaise with local businesses and major employers to take on more trainees.</p> <p>Reduce rates for local business please to keep a vibrant town centre</p>	
Geoff Fox		<p>We need more employment space and for it to be affordable to local business.</p> <p>can we allocate affordable employment as well as affordable housing?</p>	
GVA Grimley	GVA Grimley	St Modwen's specific interests at Locking Parklands will be assisted by the delivery of the North South Link as this will assist in marketing the site and servicing a number of site opportunities. However in policy terms St Modwen is in discussion with relevant Weston Villages stakeholders and open to the idea of consolidation of the employment plots within Locking Parklands to a potentially more deliverable site solution which would allow occupiers enhanced flexibility of space and uses.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Matt Griffith	Business West Chambers of Commerce and Initiative	<p>Having the right sort of employment sites in the right locations within the West of England region is vital for the future prosperity of the city-region and the employment opportunities available to local populations. Without appropriate availability of sites and premises we will be unable to attract inwards investment internationally or from the rest of the UK. Businesses currently in the city-region and seeking to relocate or expand will be unable to do so locally and are likely to move away.</p> <p>Rising commercial property prices in the West of England risk reducing our competitiveness in relation to other key regional markets from London and the M4 and M5 corridors, as well as weakening our position with the 'Northern Powerhouse' cities and Cardiff and South Wales – all of whom have aggressive strategies to drive growth and attract both national and international inward investments and relocations. Our region also faces growing international competition, given the global reach and supply chain structure of many of our region's key economic sectors.</p> <p>Our city region is currently facing a shortfall in suitable employment space for growing companies – something that is being frequently highlighted to us by our tech, creative and SME members and partners.</p> <p>We therefore welcome the Local Plan commitment to allocate land to maximise opportunities to support growth in sectors including financial and professional, high value manufacturing and design, good and drink, digital technology, media and telecoms and cultural and creative industries.</p> <p>It is also worth remembering the continued need for sufficient employment land for businesses that fall outside of these sectors, and also that the availability of a range of cheaper industrial and office options is important for the start-up potential and underlying health of even 'supported' growth sectors, such as creative and cultural or advanced manufacturing.</p> <p>We also welcome the North Somerset Local Plan finding that “there were issues around delivery of employment land development to meet the aspirations of North Somerset Council for the local economy, the threat of loss of employment land, the appropriateness of specific location and localised issues” (page 71). We also welcome the emphasis on “the importance of retaining a relative surplus of employment land ... as essential given the strong economic potential of North Somerset going forward over the plan period” (page 71).</p> <p>We therefore welcome that North Somerset give further consideration to the North Somerset Employment Land Review recommendations to:</p> <ul style="list-style-type: none"> Protect allocated employment sites Protect existing employment sites Consider additional employment sites at the Port, Airport and “on sites closer to Bristol to capitalise on opportunities provided by infrastructure investment and the economic growth prospects of Bristol” Consider proactive initiatives to support business growth. Ongoing monitoring of economic issues in order to allow planning framework to respond to market signals (page 71). <p>Although we can see the case for some consolidation of employment land (page 71), it is important that this is done on a case by case basis and does not lead to a deterioration of the overall availability and price of employment land in these locations.</p>	
Mead Realisations Ltd		A range of employment sites with good access to the M5 will help to attract business investment and growth.	
N Cooper	Claverham Future	Business investment is a long term issue, it tends to go to areas with similar established businesses so that an employment pool can be guaranteed. In the industrial revolution it was the location of raw materials that drove investment. I am not sure what Weston's USP is, industry is no longer a major force so investment is likely to have to compete with Bristol and London so what is better in WSM?	

Respondent Name	Respondent Organisation	Comment	Attached documents
Weston Town Council	Weston-super-Mare Town Council	Tourism remains an important part of Weston's economy and tourism related businesses should be protected and encouraged by planning policies. Good transport links are essential for all types of business including dualling the railway track into Weston to increase rail capacity, and also major improvement to the capacity of Junction 21.	

Document Part Name Q36. What role do you think that residential developers should play in helping to deliver employment? Should the specific link between housing and employment be maintained.

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	Yes, the link should be maintained.	
Blagdon PC	Blagdon Parish Council	The link between housing and employment should be retained to minimise the need for out of area commuting. Developers can assist by ensuring that a full range of housing stock is provided – affordable units, mixed sizes and types for singles, families and couples.	
Burrington Parish Council	Burrington Parish Council	Is there any evidence that the attempt to link the delivery of housing and employment has been successful in Weston-Super-Mare?	
Congresbury Parish Council	Congresbury Parish Council	We believe this link is vital for the development of an employment lead strategy.	
Geoff Fox		Any contribution to employment should not be at the expense of affordable housing with one exception being if it is on a brownfield site currently used for employment.	
GVA Grimley	GVA Grimley	<p>In general terms the role of housebuilders in delivering economic benefits should not be under estimated and a number of economic forecasting tools can be used to demonstrate this. With specific regards to Locking Parklands and West of Kenn Road, Clevedon St Modwen is seeking to demonstrate that residential development can unlock employment sites through pump priming required infrastructure. This point should be acknowledged in the new Local Plan.</p> <p>The policy focus on jobs has proven to be flawed and is now to the detriment of the required housing delivery trajectory that the Weston Villages need to deliver. Therefore St Modwen is looking to work with the Council and other key stakeholders to modernise the policy position (and the Section 106 provisions for Locking Parklands). We have reviewed the Atkins ELR (2018) recommendation no. 3 for reviewing existing employment policy for Weston. St Modwen could support elements of the suggested points within recommendation 3 i, ii and iii and wish to work with the Council and other major landowners to explore a deliverable solution from this list of options (or others). The key message at this stage that St Modwen wish to make is that there needs to be a move away from specific job requirements.</p>	
Hallam Land Management Ltd (David Lock Assoc)		The link between housing (social) and employment (an economic objective) is enshrined within the NPPF, which notes that these are two of the three interdependent strands of sustainable development. In line with this, HLM consider it essential to deliver houses that are linked to jobs and vice versa. As such, the policy link between housing and	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>employment at Weston Super-Mare should be retained, and this principle should be extended to the Tier 2 settlements also.</p> <p>The Land East of Clevedon provides a unique opportunity to deliver strategic-scale new housing development with strategic-scale employment development, in a location that is proximal to the strategic highway network, and stands to benefit from (and can help deliver) pipeline infrastructure improvements which will better connect the site with other strategic housing sites and other strategic employment hubs such as Royal Portbury Docks and the Bristol Airport expansion. The land has the capacity and flexibility to bring forward employment in the short term. Whilst as a potential SDL it will be planned comprehensively, short term employment provision could come forward as a potential Phase 1.</p> <p>Regarding the current policy requirement for 1.5 jobs per home, we note that this policy has been applied specifically to delivery of development at Weston Villages, and has therefore been supported by a robust evidence base that provides confidence in the delivery of this policy objective without undermining delivery or viability of the development at Weston Villages. However, we assume that the circumstances which supported such an approach were driven by site/ location specific factors, and that NSC do not propose to apply this across all strategic sites. Such an approach would not be considered effective.</p>	
Hayes Family and Mr Cope		<p>We do not agree that the specific link between housing and employment should be maintained. In the past this link has hindered the delivery of housing which is desperately needed in Weston-super-Mare in particular, which in turn hinders economic growth.</p>	
Home Builders Federation Ltd (S Green)	Home Builders Federation Ltd	<p>The house building industry is a significant driver of the UK economy. Nationally last year as well as delivering much-needed new homes of all tenures across the country in villages, towns and cities the industry supported circa 700,000 jobs (including 239,000 directly employed workers / 18% of UK construction industry), generated £2.7 billion in tax revenues (via SDLT, Corporation tax, NI, PAYE etc), spent £11.7 billion with suppliers (90% of which stays in the UK) and provided £841 million (including £122 million for new / improved schools) for infrastructure (for more information see HBF publication "The Economic Footprint of UK Housebuilding" dated July 2018).</p> <p>The Council's policy approach of specifically linking housing and employment in Weston Super Mare should be reviewed to ensure that it is robust, deliverable and effective. The 2018 NPPF sets out that planning policies should provide a clear economic vision and strategy which positively and proactively encourages sustainable economic growth having regard to local industrial strategies and other local policies for economic development and regeneration. This should be the starting point for reviewing the employment led policy in Weston Super Mare and its relationship with the new Local Plan strategy for growth and development in North Somerset including in the proposed SDLs.</p>	
KMH1		<p>Yes, but developers are here today and gone tomorrow. They are creating greater flood risk and pollution risk in the spaces that they are creating so they should pay for that impact on the environment and people in some way by providing or contributing to local services that manage these risks. E.g. maintain flood management measures/ SUDs or pay for local transport to job locations. These services will need jobs that are enduring and not temporary.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>Section 6 of the document rightly sets out the economic objective of sustainable development from the NPPF. Section 6 of the NPPF sets out further guidance on how this should be reflected in planning policies. Specifically planning policies should:</p> <p><i>'set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to local industrial strategies and other local policies for economic development and regeneration.'</i></p> <p>We consider this should form the starting point for reviewing the employment-led policy at Weston-super-Mare and how it would now relate to the new Local Plan Strategy for growth and development in North Somerset. We note that both garden villages and the expansion of Nailsea include employment proposals. How will the delivery of employment at these locations relate to delivery at Weston-super-Mare where the employment-led policy prioritises delivery of employment? Equally will the employment-</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents				
		<p>led policy at Weston-super-Mare slow down residential growth there but enable unrestricted residential growth at the new locations? If that happens will it encourage unsustainable residential commuter patterns at these new locations?</p> <p>In our view in considering these issues the new JSP and Local Plan Strategy for North Somerset fundamentally changes how the employment-led policy at Weston-super-Mare will need to operate in the future. This is because the Core Strategy Policy is an employment-led policy for the district not just Weston-super-Mare but that additional policy requirements are set out for Weston-super-Mare in the context of and to implement the Core Strategy. This needs to be addressed in the Local Plan and it cannot be dismissed as a long-term issue, because the trajectories for the strategic development areas in the JSP show North Somerset will be relying on housing numbers from the new locations from 2024/25 or in other words year 5 of the next 5 year housing land supply period.</p> <p>In addition in the context of the Core Strategy the majority of new residential development was proposed in Weston-super-Mare, which provided the opportunity to pursue an employment-led housing policy there. In the context of the JSP and the new Local Plan, the majority of the new residential development is outside Weston-super-Mare in the strategic development locations. Therefore it is inappropriate to retain a restriction on the residential development in Weston-super-Mare largely on existing commitments, and leaving residential development to come forward in the SDL's with no link to employment provision. In the context of the JSP a different policy would be operating in Weston-super-Mare compared with the whole of the West of England.</p> <p>The JSP also suggests a need for more flexibility in employment policy rather than continuation of the current policy linking provision to office use. Paragraph 23 of the submitted JSP says '<i>the continued changes in the employment market mean that flexibility is required in the employment land portfolio, in order to respond to changes in market demand during the plan period and beyond.</i>' This points to a market-led approach without policy restrictions on any part of the market within the JSP area. It requires an approach which recognises the positive role residential developers have in unlocking employment opportunities and delivering infrastructure, rather than applying a jobs/home formula.</p> <p><u>Employment – Comments on Employment Land Review</u></p> <p>The Employment Land Review concludes that the drivers of the employment-led approach were reasonable, but this is in the context of the existing policy context. It also says the majority of the rest of the district is less suitable for employment growth, but that has now changed in emerging policies which propose new employment provision in the new development locations proposed in the JSP and the emerging Local Plan. Whilst improving self-containment in Weston-super-Mare was an important aim previously, it is even more important to plan for self-containment in the new locations from the outset, otherwise they will become commuter settlements.</p> <p>The Employment Land Review also raises questions about whether the scale of employment development is deliverable at Weston-super-Mare where we consider the emphasis on B1 office development causes more problems. In particular there is no demand for the quantum of office use needed to meet the policy and that the strongest element of demand in North Somerset to 2036 is likely to be for B8 uses, but a split between office and warehouses is unlikely to meet the requirements of the policy in the plan period.</p> <p>Whilst the Employment Land Review also recognises that employment-led is a long-term policy this needs to be balanced by the fact that the housing shortage is short-term and the housing need continuous. The recognition in the Employment Land Review that the strategy is market dependent including wider macro-economic factors is important in considering the appropriate way forward.</p> <p>The Employment Land Review recognises however that the policy has been implemented on a more flexible basis including through the Joint Position Statement. All of this demonstrates the policy must change. The Employment Land Review then sets out a number of options which we comment on below:</p> <table border="1" data-bbox="551 1214 1753 1366"> <thead> <tr> <th data-bbox="551 1214 1099 1366">Options from the Employment Land Review</th> <th data-bbox="1099 1214 1753 1366">Our Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="551 1214 1099 1366"></td> <td data-bbox="1099 1214 1753 1366"></td> </tr> </tbody> </table>	Options from the Employment Land Review	Our Comments			
Options from the Employment Land Review	Our Comments						

Respondent Name	Respondent Organisation	Comment	Attached documents	
		<p>A more flexible approach to jobs to allow a balance of employment types based on the overall scale that can be accommodated possibly site by site.</p>	<p>Our preferred approach would be dispense with the jobs to homes ratio as set out in the above comments, but if it is retained, a more flexible approach as described would be a necessity in order to ensure the continued delivery of both residential and employment development.</p>	
		<p>Reviewing types of jobs required against the context of supply and demand:</p>		
		<ul style="list-style-type: none"> - Targets per site 	<p>PHSV do not support because it merely continues existing problems by reducing flexibility.</p>	
		<ul style="list-style-type: none"> - Market driven 	<p>This would be helpful in allowing the market to rebalance employment supply in Weston-super-Mare from the impact of an interventionist planning policy approach.</p>	
		<ul style="list-style-type: none"> - Hybrid 	<p>Potential support for this approach subject to the precise wording of the criteria in the policy and including a cascade approach if there is a need to ensure that not all land could be developed for a particular use, all to be monitored by the Weston Villages Delivery Group</p>	
		<p>Reviewing the delivery mechanisms including the link to housing:</p>		
		<ul style="list-style-type: none"> - Longer time frame and re-phasing of employment to housing targets 	<p>Not appropriate in the context of adopting a hybrid policy as above.</p>	
		<ul style="list-style-type: none"> - Provision of land and premises through service sites/ speculative provision 	<p>PHSV do not support this approach.</p>	
		<ul style="list-style-type: none"> - Re-planning and collaboration (currently in place but unsuccessful due to lack of certainty of delivery) 	<p>PHSV do not support this approach due to the failure of the existing policy.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>- North Somerset Council intervention</p> <p>As set out in the Employment Land Review this depends on the ability of the Council to deliver and any restrictions attached to any policy on delivery of housing. Therefore PHSV does not support this approach.</p> <p>Notwithstanding our preferred approach set out above, PHSV consider it is important that the Council continues to work with developers and landowners to deliver a policy and mechanism through the new Local Plan which allows the delivery of both housing and employment development without the need for a formulaic jobs per home approach.</p>	
Wrighton Parish Council	Wrighton Parish Council	Yes. It is stated in the preceding paragraphs that the policy has seen an improvement in the delivery of employment within WsM, so why change what appears to be working?	

Document Part Name Q37: How else can the Local Plan help to maintain and increase employment growth associated to Weston-super-Mare?

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	Innovate and create a policy encouraging Live-Work unit provision in urban and rural areas to stimulate economic activity and reduce commuting traffic pressures.	
Blagdon PC	Blagdon Parish Council	We have no further suggestions.	
Congresbury Parish Council	Congresbury Parish Council	The local plan gives the opportunity to plan growth strategically and in an organised manner.	
GVA Grimley	GVA Grimley	The Plan policy will need to respond to the rapidly changing employment market in terms of the emergence of non-traditional B class workspace and desire for flexible working. Such space could include conversion of buildings into smaller spaces or as part of mixed use conversions or new builds.	
J Gower-Crane		<p><u>(6. Employment)</u> The NPPF has three dimensions to sustainable development, economic, social (built environment incl housing & services) and environmental (protecting & enhancing our natural, built & historic environment). We feel greater attention is being spent on the first two at the detriment of the environment and local Bleadon</p> <p><u>Role of the new Local Plan</u></p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		What about agricultural/farming opportunities for the next generation?	
KMH1		Only to add that more jobs in Weston are needed to avoid the senseless development of commuter towns that feed Bristol.	
Mendip Hills AONB unit	Mendip Hills AONB Partnership	Bristol Airport is within the 'setting' of the Mendip Hills AONB. Proposed policies should ensure that any development proposals include consideration of the nationally protected landscape and the special qualities of the AONB.	
South Bristol Business (M. Knight)	South Bristol Business	<p>We were interested to read the section of the Document relating to Employment. We again give support to policies to significantly increase new business creation, expansion of existing businesses and thereby, the creation of jobs and employment, particularly, for local people. However, we have concerns as to whether there is an adequate supply of allocated Employment Land for both commercial and industrial uses within the North Somerset Council Local Plan to meet the potentially great economic challenge of the wider area. We support the provision for both adequate "high tec" and "low tech" job creation and we applaud and support Junction 21 - Weston Gateway new business and employment developments.</p> <p>However :- Importance of North Somerset and South Bristol Economic Border co-operation and the future gains that can arise for both Authorities.</p> <p>We wish to raise, once again, our concern at the absence of comment as to the wider North Somerset and South Bristol economy and in this context, the adequacy of Employment Land and Infrastructure. We recognise that this is at the same time, both a local matter and a wider West of England strategic matter, as in practice North Somerset and South Bristol are inextricably joined in economic terms. North Somerset has not seen private sector employment growth opportunities, on its northern border, to complement past, current and future house-building outputs and Bristol City Council has similarly not been able to achieve private sector business and employment expansion in South Bristol. We believe a strong contributory reason for this regrettable position is the lack of Employment/Industrial Land and traffic infrastructure provision. This must be a matter of ongoing concern for both Councils, in an area of significant population set to increase under the Local Plan. We suggest for consideration, enhanced cross border local authority dialogue with private sector business to address the issues to secure private sector business and employment generation over this wider area.</p>	
Wrington Parish Council	Wrington Parish Council	No comment, however it is important to recognise that an over-emphasis on employment growth in WsM and its associated housing will quickly ruin what is attractive about living in North Somerset.	

Document Part Name

Bristol Airport and Royal Portbury Dock

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex		see below	
Ian	Mr	My view is that whilst linking business opportunities in Portishead to the Dock is a good idea, I would not like to see "allowances for additional land supply in and around Portishead" to impinge onto the Green Belt, especially in the vicinity of the Nature Reserve.	

Respondent Name	Respondent Organisation	Comment	Attached documents
JemB		Global warming will mean the port is 2,000 miles closer to Far East than now by 2030s due to the opening of North West and North East Passages. This will greatly increase demand for use.	
Matt Griffith	Business West Chambers of Commerce and Initiative	<p>Business West welcomes the continued inclusion of Strategic Employment Locations in the draft Local Plan Issues and Options paper for Bristol Airport and Bristol Port – given the importance of these two locations as regional strategic assets, their underpinning vital importance for local, regional, national and international connectivity and their potential for future employment locations. We also support the review of the green belt policy in relation to Bristol Airport (see below) to enable its long term development which will be transformational for the region.</p> <p>We would be keen to understand in more detail what their designation as Strategic Employment Locations means in practical terms in terms of what additional employment land would be granted and what this means for employment creation and new opportunities for businesses within the region. Bristol Port</p> <p>We welcome the possibility that there could be additional land supply in and around Portishead to meet demand for high growth businesses linked to port activities.</p>	

Document Part Name Q38. What are your thoughts on the four proposed options for a Bristol Airport policy in the new Local Plan 2036? Do you have a preferred option?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex		see below	
AliB		Bristol airport is in danger of losing the advantages it had for consumers as a regional airport. I favour option 1 as it will constrain further expansion which will be better for consumers and for the environment, both locally and globally.	
Andrew		There must come a point when the airport reaches a natural maximum given its catchment area and inaccessible location due to the lack of motorway or rail. Green belt reallocation to permit further expansion should only as part of a wider consideration of the protection of the character of North Somerset (which is an objective of the JSP). For example redesignation at Ashton Vale for Housing and at Lulsgate for the Airport could be considered but only if high amenity value countryside (such as that which would be destroyed by the large housing estate and roads at Churchill) can be protected.	
Aston	Aston and Co UK	<p>No expansion should be permitted at the airport until multi modal public transport links are available. This needs to be forward looking and bold e.g. a rail link to Temple Meads, or frequent rapid transit connections with a priority lane connecting the airport to Bristol, Weston, Nailsea, Portishead and Clevedon.</p> <p>Subject to that investment and provision, Option 3 (removal of the airport area from the GB and the safeguarding of additional land) is supported.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Avon Wildlife Trust	Avon Wildlife Trust	<p>Avon Wildlife Trust's position is that the demand for air travel should be managed down, and that there is no demonstrable case for expansion of air traffic in the UK. The cases for expansion are driven by demand rather than need and Avon Wildlife Trust are opposed to this expansion due to the significant adverse environmental impacts caused by the increase of air travel on a local and global scale.</p> <p>However, the Trust recognises that air transport is currently a contributor to the region's economy, albeit on which has the aforementioned adverse environmental impacts. With this in mind, proposals for airport expansion cannot be set out on economic benefits alone; they need to be developed alongside environmental principles, within appropriate constraints, and seek to secure benefits for biodiversity (and other environmental factors) wherever possible. This is in line with the objectives of the 25 year environment plan and the UK's emerging net gain policy.</p> <p>Bristol Airport is situated near to ecologically sensitive and valuable sites including Goblin Combe (SSSI) and King's Wood and Urchin Wood (SSSI). Any adverse impacts on these important sites and the wider ecological networks that support them must be understood, avoided and mitigated as appropriate. We would support a strategic solution for mitigation that best supports the natural environment at the landscape scale.</p>	
backwell		<p>Any further development of Bristol Airport will have a critical effect on its neighbourhood in North Somerset</p> <p>I note the that Plan comments that "the remainder of the (Airport) site is within the Green Belt. Development there is largely inappropriate"</p> <p>"Restrictions on car parking – (there appear to be none – it expands inexorably into green belt land.)</p> <p>Restrictions on night flying – it seems to be increasing not restricting.</p> <p>Currently, 3,400 are employed at the airport for their current 8m passenger movements. When the airport meets 10m, – there could be 4,250 employed. Expansion to 20m passenger movements could mean 8,500 people employed How will they get to the airport? The majority of staff travel by car. This provides a further load on the existing minor roads and rat runs to the Airport . I note that Bristol Airport offers staff free car parking at work, free holiday parking and also a Friends & Family holiday car parking discount scheme. Is this encouragement to travel by car consistent with the Plans statement on managing car travel?</p> <p>Any further erosion of Green Belt to support airport expansion is therefore indefensible.</p>	
backwellresidents	Backwell Residents Association	<p>BRA is concerned about the potential impact of future airport expansion upon Backwell the implications of possible future infrastructure and the Airport's desire to create improved access from the M5 corridor. Such proposals could result in significant harm to the Backwell area, urbanising the character of the area, introducing further traffic and congestion and compounding issues of air quality and noise. Any proposals for future expansion of the Airport must ensure that its transport needs can be met through sustainable transport modes and infrastructure, enhancing connections to Bristol and the M5 along the existing A38 corridor.</p> <p>The above comments are intended to provide constructive input to this early stage in the Local Plan process and are without prejudice to BRA's objections to the JSP. BRA welcomes the opportunity to engage with NSC throughout the plan-making process. Please keep us updated on future consultation events.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Barrow Gurney Parish Council	Barrow Gurney Parish Council	With regard to Bristol Airport, Option 1 is preferred, however, by removing the airport from the Green Belt, we set a dangerous precedent that opens other parts of the Green Belt to acquisition and speculative development. The airport should not be gifted the opportunity to develop within the Green Belt as we believe it would make imposing and enforcing conditions such as infrastructure, more difficult.	
Blagdon PC	Blagdon Parish Council	We support comments made by the Parish Council Airport Association in respect of airport expansion. Our preference is for option 1. We have yet to see any justification for the proposed increase to 20 mppa by the 2040s and continue to be concerned about the ways that planning regulations and specific conditions are being exploited to the detriment of local communities and the Green Belt.	
Bristol Airport	Bristol Airport	Option 4 has the clear advantage over Option 3 in that it would provide certainty, not least by allowing long-term planning towards a 'sustainable pattern of development' around the airport, in line with NPPF paragraph 138. This option is a clear preference as it will: <ul style="list-style-type: none"> • Provide absolute policy clarity for all involved; • Support the potential for the continued phased delivery of the airport, in line with the emerging Master Plan; • Ensure that the airport's identified operational requirements can be planned with certainty; • Provide policy certainty to justify and support transport investment, and support its role as an integrated public transport hub, to the benefit of community members; • Provide greater certainty over future employment opportunities, essential as recognised as a 'Key Strategic Infrastructure Employment Site'; • Give greater certainty to communities, airlines, airport users and investors in the wider community, and for BAL itself; and • Ensure that economic benefits can be expedited and avoid unnecessary restrictions on sustainable growth. <p>Bristol Airport is strongly in favour of Option 4 being taken forward as the preferred options for the development of the airport within the Draft Local Plan.</p> <p>The airport recognises, however, that sufficient progress will need to be made in the provision of greater certainty on the identified 'key aspects' (as referenced in the Issues and Options document) in advance of the Draft Local Plan. Bristol Airport is committed to providing this evidence in due course, and to working with NSC to ensure that the Local Plan provides a robust policy framework for the sustainable growth of the international gateway for the North Somerset and the wider region.</p>	ES 210 - NSC Local Plan - Bristol Airport - FINAL SUBMIT.pdf (281 KB)
Bristol City Council (Local Plan)	Bristol City Council local Plan team	Bristol Airport is identified as a key strategic infrastructure employment location in the emerging West of England Joint Strategic Plan (Policy 4). As well as offering the local economy strong international connections, the airport serves as a key location for jobs in our region. Bristol City Council welcomes North Somerset Council's recognition of the existence of additional growth opportunities at Bristol Airport. It supports the Local Plan consultation's consideration of options for future planning policy at and around the airport through the plan process. The City Council would be supportive of an approach to the airport which is consistent with the strategic approach set out in the Joint Spatial Plan.	
British Horse Society	British Horse Society	As the airport expands, so will the traffic around it, the more so as the airport is planning for significantly increased parking. In accommodating this expansion, NSC needs again to ensure that the existing rights of way network on routes around the airport is not adversely affected. It should be incumbent upon the airport to improve rights of way around it to make them safer; this particularly applies to crossing points over major roads (A38, A370). By the same token, it should be possible to develop a link from Felton Common through to Cleve Hill, where the Brockley Combe Road is now so busy it is almost impossible to cycle, and certainly, to ride.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Burrington Parish Council	Burrington Parish Council	Existing policy should be retained and the tightest possible controls exercised over airport expansion. The airport needs to justify the scale of expansion proposed and demonstrate that it can be accommodated without seriously adverse impacts on the surrounding area. Surface access improvements and car parking should be delivered before expansion of the terminals and apron and increased numbers of flights are allowed beyond current permissions.	
Butcombe		<p>Noting that there is no option to reduce the size of the airport we prefer the first option for the following reasons:</p> <ol style="list-style-type: none"> 1. the current transport infrastructure cannot cope sustainably with current passenger levels, estimated at 8 million passengers per annum (mppa) for 2017. With growth beyond 10 mmpa and the Airport's imminent planning application for up to 12 mmpa, the problems from additional passenger traffic, additional employees travelling from considerable distances, often by car, and increased volume of service traffic from retail outlets to plane fuel deliveries will add intolerable congestion to an already over-burdened highway system. 2. The communities around the Airport North Somerset generally, and Butcombe in particular, suffer increasingly from the scourge of unauthorised airport car parking and consequent hazards ranging from noise and light disturbance 24 hours a day, serious landscape blight, rat-runs by the employees of such sites, additional rubbish on lanes. Control of these sites is clearly beyond the capacity of North Somerset Council planning enforcement and the local community's quality of life is already badly adversely affected as a result. 3. In addition the area around the Airport is used by private cars and taxis waiting to collect passengers arriving at the Airport but not wishing to pay the Airport's vehicle charge to access the pick-up area. This results in cars parking illegally and inconsiderately, and potentially jeopardising emergency vehicle access. It also brings with it the scourge of litter & detritus dropped from waiting vehicles <p><i>We would like the Local Plan to support a coordinated approach to managing off-site passenger car parking, ideally via a formal Supplementary Planning Document adopted by North Somerset Council and partnered by the Airport.</i></p> <p><i>The solution to these issues does not lie simply in the easy option of further expansion of the Airport into the Green Belt in order to create more car parking but in the strategic identification of sustainably accessible off-site locations, serviced by public transport shuttles, in the wider West of England area.</i></p> <p>We are also very surprised that we can't find any reference in the Local Plan to the Master Plan by Bristol Airport, which ought to be a material consideration in this discussion.</p> <p>Noting that there is no option to reduce the size of the Airport, our strong preference is for Option 1: 'Retain the existing policy' as the only option that can comply with North Somerset Council's own stated policy CS23 on the Airport in the North Somerset Council Core Strategy Jan 2017 -</p> <p>CS23: Bristol Airport</p> <p><i>Proposals for the development of Bristol Airport will be required to demonstrate the satisfactory resolution of environmental issues, including the impact of growth on surrounding communities and surface access infrastructure.</i></p>	
Butcombe Parish Council	Butcombe Parish Council	<p>Butcombe Parish Council believe that, in the face of the massive development proposals suggested across North Somerset as a whole, it is absolutely critical that those undeveloped areas of the Green Belt around Bristol Airport are absolutely preserved. They should be protected both as an amenity for the new housing populations to enjoy and use for recreation and public health benefits (North Somerset Council Core Strategy Jan 2017 - Policy CS9: Green Infrastructure), and also in order to maintain local biodiversity (North Somerset Council Core Strategy Jan 2017 - Policy CS4 – Nature Conservation) and to protect the local landscape (North Somerset Council Core Strategy 2017 - Policy CS5 – Landscape and the Historic Environment).</p> <p>In particular we note that the North Somerset Council Landscape Character Assessment SPD October 2018 : E6 – Clevee Ridges & Combes highlights the risk to the local landscape around Butcombe as –</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • <i>Encroachment of development along roads and in villages, particularly along the base of the ridge at Cleeve and Backwell, and rising up the open slopes where it is highly visible from adjacent lowland areas.</i> • <i>Visual impact of unsympathetic urban edges and urban fringe influences within the immediately adjacent landscapes.</i> <p>We also note that one of the key Priority Objectives of the North Somerset Council Core Strategy Jan 2017 is to: <i>Continue to support North Somerset's existing Green Belt in order to prevent the sprawl of Bristol and its encroachment into valued countryside and to preserve the character of existing settlements; elsewhere, valued strategic gaps between settlements and characteristic green spaces and areas will be protected and enhanced.</i></p> <p>Butcombe Parish Council therefore considers it critical that the Green Belt around Butcombe, including Bristol Airport, is maintained absolutely in order to comply with the Core Strategy and its necessary implementation of the Landscape Character Assessment SPD. Maintaining the Green Belt around Bristol Airport is also vitally important in preventing urban sprawl.</p>	
Butcombe Parish Council	Butcombe Parish Council	<p>Butcombe Parish Council strongly supports 'Option 1: Retain the existing policy'.</p> <p>Butcombe Parish Council are particularly disappointed with the Local Plan's wording of this consultation in respect of Bristol Airport. North Somerset Council has a duty of responsibility to residents of North Somerset to give a balanced approach to proposed development. The opening paragraph extols the economic benefits but does not allude to any of the economic 'dis-benefits' such as the tourist deficit. Secondly, there is no recognition of the environmentally harmful activity of flying and airport operations/ traffic generation in terms of local air quality and national carbon emissions. And lastly – and most importantly - not one of the options mentions the impacts on residents from traffic congestion on the A38 and small rural lanes, and also from unauthorised airport related parking, especially in and around Butcombe.</p> <p>The current transport infrastructure cannot cope sustainably with current passenger levels, estimated at 8 million passengers per annum (mppa) for 2017, particularly when combined with the consequent increase in service and fuel delivery vehicles too. With growth beyond 10 mmpa, let alone to the Airport's imminent planning application for up to 12 mmpa, there will not only be no respite from the existing problems, but incremental intensification.</p> <p>North Somerset generally, and Butcombe in particular, suffer increasingly from the scourge of unauthorised airport car parking. This results in significant noise and light disturbance to residents, as well as causing adverse visual intrusion to the local rural landscape, and also resulting in the creation of dangerous vehicular 'rat runs' by operators along inappropriate rural lanes. Control of this blight is clearly beyond the capacity of North Somerset Council planning enforcement and the local community's quality of life is increasing being adversely affected as a result.</p> <p>The area around the Airport, including roads and lanes in Butcombe, is increasingly used by private cars and taxis waiting to collect passengers arriving at the Airport but not wishing to pay the Airport's vehicle charge to access the pick-up area. This results in cars parking illegally and inconsiderately, and potentially jeopardising emergency vehicle access. It also brings with it the scourge of litter & detritus dropped from waiting vehicles, for example in New Road leading off the A38 near Redhill.</p> <p>Neither does the Local Plan consider the effect of Airport generated activity on local air quality, with particular reference to vehicle emissions along the A38 close to the Airport.</p> <p>Butcombe Parish Council would like to see the Local Plan support a coordinated approach to managing off-site passenger car parking, ideally via a formal Supplementary Planning Document adopted by North Somerset Council and partnered by the Airport.</p> <p>Butcombe Parish Council particularly supports Option 1 because the solution to these issues does not lie simply in the easy option of further expansion of the Airport into the Green Belt in order to create more car parking but in the strategic identification of sustainably accessible off-site locations, serviced by public transport shuttles, in the wider West of England area.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>We particularly highlight the omission of any reference in the Local Plan to the current Master Plan consultation currently being undertaken by Bristol Airport, which ought to be a material consideration in this discussion.</p> <p>In conclusion Butcombe Parish Council supports 'Option 1: Retain the existing policy' as the only option that can possibly comply with North Somerset Council's own stated policy CS23 on the Airport in the North Somerset Council Core Strategy Jan 2017 -</p> <p>CS23: Bristol Airport</p> <p><i>Proposals for the development of Bristol Airport will be required to demonstrate the satisfactory resolution of environmental issues, including the impact of growth on surrounding communities and surface access infrastructure.</i></p>	
C Allsop		<p>The proposed airport expansion and the infrastructure of new roads to accommodate the increases in passengers again is simply inappropriate for the surrounding areas. As with the proposed transport hub at the rail station, where is the funding for the additional roads required. Again, noise will increase for the surrounding villages as will the traffic through Church Town which has already become a rat run for vehicles heading for the airport. For the existing residents, it appears that the planners simply like to take out a marker pen and sketch roads with out any regard to the destruction to the village and its semi-rural surrounds.</p>	
Cleeve Parish Council	Cleeve Parish Council	<p>Cleeve residents are heavily affected by airport activities such as ground and air noise and car parking issues from passengers car parking on the roads in Cleeve. CPC considers that Bristol Airport is already a successful regional airport. It offers a choice of over 110 destinations and anyone in the south west can reach any destination in the world by going through the European hubs such as Frankfurt, Paris and Amsterdam. Any further expansion is going to damage the quality of well being for local residents and damage our own environment and take away enjoyment of the countryside.</p> <p>Secondly and more importantly it is going to contribute even more carbon emissions to climate change. Air travel remains the most climate-damaging form of travel and expanding the airport will therefore have a significant impact on climate change. Climate change is an issue and should have been included in this section. The Joint Spatial Strategy contains an explicit commitment to making a 50% cut in emissions by 2036.</p> <p>Thirdly, there will be an enormous increase in the number of journeys to and from the airport which will lead to significant issues around congestion, pollution and infrastructure. The Bristol South West Economic Link Study looking at infrastructure has not yet been published for comment.</p> <p>Option 1: has been identified by CPC as our preferred choice as it would limit impacts of airport expansion on our residents.</p> <p>Option 2: The airport is currently developing on the Green Belt on the south side by using permitted development applications. It is moving development which was expected under the planning consent of 2011 to be on the north side of the airport to the south such as the administration block. Through the use of permitted development and special circumstances we would again see Bristol Airport develop further on green belt. Green belt does not limit further expansion as we have seen through recent permitted development applications.</p> <p>Options 3 and 4: Firstly, no one knows what the future will hold, thus land should not be secured for further development at the airport. Secondly, there is no certainty that infrastructure can be constructed such as the mass transit or light rail without harming the environment or be delivered on time. Thirdly, if autonomous cars become the norm there will be no need to release further land.</p>	
Congresbury Parish Council	Congresbury Parish Council	<p>Option 3 sounds a suitable way to allow the airport to grow. However a fundamental issue of whether the airport can really grow any further without large scale improvements in sustainable transport of passengers. This needs to be explored before actually saying how the airport site may be developed.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
CPRE Avonside	CPRE Avonside, North Somerset District	<p>Existing policy, quite rightly in line with planning permission granted in 2011 encourages optimum use of the existing developed area north of the runway, where a Green Belt inset exists. Unfortunately, local communities have lost confidence that Bristol Airport will deliver on its commitments as previous S106 agreements have not all materialised. The airport has already exploited its opportunities for permitted development and utilised Green Belt for car parking and new development which has had a negative impact on the south side of the airport.</p> <p>Option 1 to retain the existing policy is the only option acceptable.</p> <p>CPRE North Somerset support the PCAAs more detailed airport and transport response to this consultation.</p>	
Cresten		<p>Option 1. The highly visible structure currently being built under permitted development is obtrusive enough in the Green Belt. The Green Belt should be protected. Felton Common is a valued green area for residents who are already suffering high noise levels, but increased noise and pollution from yet more air traffic will make living conditions close to intolerable for many residents in the flight path, and be a major contributor to road congestion on the A38 and other local roads. Bristol Airport carries less than 20% business traffic and no-one can reasonably predict an upturn in that proportion in the current economic climate. Holiday air travel comes at a considerable cost to the environment. Climate change is very real, severe consequences are already apparent worldwide, and extending the Airport, which will inevitably increase carbon emissions from aircraft and road traffic, is a negative step.</p>	
Diane		<p>I prefer option 1 - retain the existing policy, for the reasons listed as Advantages.</p>	
F Parry		<p>My preferred options are Options 1 and if necessary 2. There are already plenty of airplanes in our skies, albeit Backwell is fortunate not to sit directly under Bristol airport flight paths.</p>	
FH		<p>The airport is an important transport resource for this region and the international links to Bristol. However, it is close to passenger capacity and expansion should respect the immediate green belt and air quality. Investment should be made in the transport links to the airport and especially servicing Backwell, Nailsea, Yatton, Clevedon and Portishead. This would reduce the parking space and green belt required the support this airport.</p>	
Grassroots Planning	Grassroots Planning	<p>Q38 (Bristol Airport): we support the expansion of Bristol Airport, but would want to ensure that the policy wording makes provision for, and reference to, the need for complementary facilities which lie in close proximity to the Airport, such as hotel accommodation and car parking. Much of the land to the west of the A38 is already in use as car parking. Any expansion to the airport is going to put greater pressure on surrounding land for car parking and other uses related with the airport. It is our view that consideration should be given to allocating the Lulsgate Quarry site as part of the airport expansion. The Quarry site is adjacent to the airport and while not considered to be "previously developed land", the land has been formerly used as a quarry which means it represents disturbed land in the countryside where the levels changes associated with the quarrying activities means that the landform has the ability to shield any development within the site from wider views.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Hayes Family and Mr Cope		<p>5.37 We consider that the new Local Plan 2036 should be aspirational in its ability to deliver additional employment and encourage the regional growth of Bristol Airport, increasing the number of jobs and contribution to the economy. We are therefore of the opinion that Option 4 is the most appropriate given the lifespan of the plan which aims to run until 2036.</p> <p>5.38 We would encourage early dialogue with the Airport now to discuss their long-term aspirations to ensure that the policy is tightly-worded to ensure that there is not inappropriate use of the Green Belt, as well as meeting their needs. As discussed under a previous question, we suggest that a review of the Green Belt is required in any event and so this could be undertaken now to determine the best option for growth.</p>	
Highways England	Highways England	<p>The I&OD and the JSP identify Bristol Airport as a Strategic Employment Location within North Somerset. We continue to work with Bristol Airport to better understand the future aspirations for growth, the development of the Masterplan for 20 million passengers per annum and the highways and transport implications of the proposed development.</p> <p>We assume that the proposals for growth at the Airport (as a Strategic Employment Location) have been tested through the JSP, but we would welcome further clarification on the detail of the assessment, the likely impact on the SRN and the scale and nature of any necessary mitigation.</p> <p>We note that the Bristol South West Economic Links Transport Study (BSWEL) will look to understand the constraint and opportunities to growth, including intervention options along the A38. Highways England is currently a board member for the BSWEL study and we look forward to better understanding how any interventions identified will be brought into policy in the JSP and North Somerset Local Plan.</p>	
J Gower-Crane		<p>(7. Bristol Airport) How many airport employed people live in NSC? It seems to be all about growth not need</p> <p>What are the current and future predicted health and environmental impacts for such a large proposed expansion? What are the local and regional impacts, how does this fit with climate change aspirations and reduction in CP2 levels? Not enough public discussion at a local level has been had to answer this question with all the relevant and related facts.</p>	
J Rodway	Butcombe Parking Group	<p>Bristol Airport Parking Communities Group (BAPCoG) is a local community group concerned with authorised and unauthorised airport related parking and ancillary traffic issues.</p> <p>The current transport infrastructure cannot at present cope sustainably with current passenger levels, estimated at 8 million passengers per annum (mppa) for 2017, particularly when combined with the consequent increase in service and fuel delivery vehicles too. With growth beyond 10 mppa, let alone to the Airport's imminent planning application for up to 12 mppa, there will not only be no respite from the existing problems, but significant incremental intensification.</p> <p>North Somerset generally, and Butcombe in particular, suffer increasingly from the scourge of unauthorised airport car parking. This results in significant noise and light disturbance to residents, as well as causing adverse visual intrusion to the local rural landscape, and also resulting in the creation of dangerous vehicular 'rat runs' by operators along inappropriate rural lanes. Control of this blight is clearly beyond the capacity of North Somerset Council planning enforcement and the local community's quality of life is increasing being adversely affected as a result.</p> <p>The area around the Airport, including roads and lanes in Butcombe, is increasingly used by private cars and taxis waiting to collect passengers arriving at the Airport but not wishing to pay the Airport's vehicle charge to access the pick-up area. This results in cars parking illegally and inconsiderately, and potentially jeopardising emergency vehicle access. It also brings with it the scourge of litter & detritus dropped from waiting vehicles, for example in New Road leading off the A38 near Redhill.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>BAPCoG would like to see the Local Plan support a coordinated approach to managing off-site passenger car parking, ideally via a formal Supplementary Planning Document adopted by North Somerset Council and partnered by the Airport.</p> <p>BAPCoG's strong preference is for Option 1 because the solution to these issues does not lie simply in the easy option of further expansion of the Airport into the Green Belt in order to create more car parking but in the strategic identification of sustainably accessible off-site locations, serviced by public transport shuttles, in the wider West of England area.</p> <p>We particularly highlight the omission of any reference in the Local Plan to the current Master Plan consultation currently being undertaken by Bristol Airport, which ought to be a material consideration in this discussion.</p> <p>In conclusion BAPCoG supports 'Option 1: Retain the existing policy' as the only option that can possibly comply with North Somerset Council's own stated policy CS23 on the Airport in the North Somerset Council Core Strategy Jan 2017 -</p> <p>CS23: Bristol Airport</p> <p>Proposals for the development of Bristol Airport will be required to demonstrate the satisfactory resolution of environmental issues, including the impact of growth on surrounding communities and surface access infrastructure.</p>	
JLS		Support Option 1. The airport has reached it's capacity and should continue to operate at current passenger levels.	
John Miners		All four proposed options for development and expansion of the airport site, take no consideration of the damaging effect on the existing lanes that currently service the airport. Davis Lane, Nailsea Wall Lane, Netherton Wood Lane and Chelvey Lane take the full brunt of airport traffic accessing from M5 junction 20. Therefore a relief road should be constructed before any airport expansion.	
Lands Improvement		<p>BRISTOL AIRPORT</p> <p>9.1 We support proposals to expand Bristol Airport and feel that the Council should plan positively to facilitate them. In order to provide certainty and avoid undue delays, we consider it appropriate to remove land from the Green Belt that would be safeguarded for its future expansion.</p> <p>9.2 We consider that such an approach should be carried forward within other areas of North Somerset where the Green Belt makes only a limited contribution and where those locations are sustainably located.</p>	
Local Access Forum	Local Access Forum	As the airport expands, so will the traffic around it, the more so as the airport is planning for significantly increased parking. In accommodating this expansion, NSC needs again to ensure that the existing rights of way network on routes around the airport is not adversely affected. It should be incumbent upon the airport to improve rights of way around it to make them safer; this particularly applies to crossing points over major roads (A38, A370). By the same token, it should be possible to develop a link from Felton Common through to Cleve Hill, where the Brockley Combe Road is now so busy it is almost impossible to cycle, and certainly, to ride.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Long Ashton Parish Council	Long Ashton Parish Council	<p>The Parish Councils Airport Association has made detailed comments on the proposals in respect of Bristol Airport which LAPC support.</p> <p>Particular concerns for LAPC are</p> <p>Increased noise from the airport caused by increased overflying including night flights.</p> <p>Increased traffic and poor accessibility of the airport from Long Ashton owing to lack of public transport.</p> <p>Encroachment into the green belt</p> <p>Lack of compliance with existing planning agreements (e.g. multi story car park).</p> <p>Option 1 would be the preferred option. The airport has or will soon reach a natural limit on passenger numbers. Its impact on the green belt and traffic is already substantial. The wider effects of further expansion, if permitted, on traffic congestion and pollution need to be considered.</p>	
M Hayman	.	Until long term transport routes have been improved, we support Option 1.	
Matt Griffith	Business West Chambers of Commerce and Initiative	<p>We welcome the clear recognition in the draft that the Airport's growth ambitions are warmly welcomed and that current growth at the Airport is clearly constrained by existing planning policy – notably the tight constraints imposed by the existing Green Belt designation for existing and adjoining land within and next to the airport.</p> <p>The Airport is a vital provider of employment and connectivity for the region and offers real potential for jobs growth, but this will be most strongly supported if it was accompanied by helping to release employment land and employment and business opportunities on the future Airport site. There are many examples both nationally and internationally where regional airports have been drivers of a range of business sectors and employment locations – and with strong overlaps and growth possibilities in companies ranging from logistics, to manufacturing, to international facing professional services.</p> <p>There therefore currently appears to be a clear gap in thinking between the top level commitment of North Somerset and the region to the Airport as a Strategic Development Location, with the less ambitious detail being set out in this version of the Local Plan.</p> <p>For example the document states several times that “it is not intended to allow general employment development that does not need to be located at the Airport” whilst also appearing to be quite narrow in employment uses “that would benefit from a connection to the airfield, such as aircraft maintenance” (both quotations, page 77) or the need for land to be “demonstrably airport-related” (page 79).</p> <p>We would suggest that seeking to limit employment to activities such as “aircraft maintenance” or that which is “demonstrably airport related” could inadvertently significantly constrain the value of the Airport as a Strategic Employment Location, whilst also risking a misunderstanding of the role of international connectivity in underpinning and driving successful airport employment growth generation in the 21st Century. For example a company designing new prototype models for international supply chains would clearly benefit from an airport location, and provide much needed high value employment business growth.</p> <p>It is vital that North Somerset understands this potential with suitable research and analysis and expands what this means for the Airport's designation as a Strategic Development Locations and in future planning terms.</p> <p>We strongly welcome the consideration within the Local Plan of greater flexibility for the Airport and its relevant current Green Belt constraints set against its growth and Masterplan Ambitions.</p> <p>We believe Options 1 and 2 would be unnecessarily restrictive given the importance of the Airport for North Somerset and the region. We would be supportive of both Option 3 or Option 4 as set out in the document. Option 4 may be more preferable since it offers less uncertainty, it seems to align with the emerging Master Plan and it provides the flexibility for airport expansion and mass transit schemes, and employment schemes to drive international connectivity, to be delivered.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Mendip Hills AONB unit	Mendip Hills AONB Partnership	Regarding key issue 3 (the implications of the proposed expansion of Bristol Airport in terms of factors such as noise, surface transport, parking, built development and Green Belt changes): Bristol airport is within the 'setting' of the Mendip Hills AONB and as such factors should include the Mendip Hills Area of Outstanding Natural Beauty.	
Mendip Hills AONB unit	Mendip Hills AONB Partnership	Re p.80: The impact of transport on the natural environment (and landscape) should also be a consideration. Policy D2 under the Development and Transport Objectives within the adopted Mendip Hills AONB Management Plan 2014-2019 sets out 'ensure that the special qualities of the AONB are fully respected in the planning, design, provision and management of all types of transport and associated infrastructure'.	
Mr and Mrs Dobson		<p>It is a concern that the final Joint Transport Plan is not in place. This plan stresses the importance of infrastructure being provided before development takes place. However, the track record both nationally and locally in the delivery of infrastructure projects is not good, often for reasons beyond the control of local authorities such as withdrawal of funding. The Portishead Rail link is an example of a delayed worthwhile scheme. There are also a number of significant stakeholders who need to deliver major schemes, Highways England and Network Rail. Problems encountered in implementation will affect the soundness of the plan.</p> <p>It is important to recognise the impact on existing infrastructure and connections to adjacent authorities. For example the A370 through Weston super Mare and Sedgemoor which is already in need of improvement. Residents in Bleadon have serious concerns about the safety of the access points to the village and hillside community. Funding will be required beyond that for new schemes.</p> <p>Modifications suggested</p> <ul style="list-style-type: none"> • Both the Spatial Plan and Transport Plan have significant dependencies and should be delivered and approved in parallel. In addition, please recognise the need to upgrade and maintain existing infrastructure. • The plans should include a clear funding strategy and agreed forward programme to ensure that the infrastructure can be provided in advance of developments. • Needs should be identified for each community and tested to ensure there will be no significant strain on existing infrastructure at any stage of the development and a move is made to more sustainable transport. • The provision of the necessary infrastructure and transport, either ahead or alongside the development should be made a precondition for granting approval of the strategic development sites. 	
N Cooper	Claverham Future	The Airport is a success story for the region, its continued development is inevitable. Option 3 and 4 are the same as the safeguarding an additional area would blight the extra area for any other purpose. It is best to make provision against a proper plan now. This is not to say that option 4 area as shown is correct, any additional area must be rigorously planned in advance against a set of supportable scenarios.	
Nailsea Town Council	Nailsea Town Council	Significant employment growth at Bristol Airport must recognise the need to facilitate access for employees. Nailsea and Backwell are the nearest residential growth areas but access from them, to and from the airport, is inadequate and must be improved.	
Natural England	Natural England	Natural England recognises the importance of Bristol Airport for the West of England economy and the potential benefits of allocating additional land to airport related development, including providing more certainty for investors and support for sustainable transport solutions. Notwithstanding this Bristol airport is close to national and European designated sites and the potential extension area would appear to bring the airport closer to Brockley Hall Stables SSSI, which is an important greater horseshoe maternity roost and a component of the Bats SAC. The airport also generates significant road traffic, with impacts on a much wider area, including parts of the Mendip Hills AONB.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		It will be essential therefore that any changes to the green belt/airport boundary are informed by robust evidence to ensure key ecological and landscape features on and off-site are identified and protected and that any off-site mitigation requirements are secured in accordance with the principles and priorities of the WoE GI Plan.	
P Heaton-Armstrong		<p>There's been a lot of publicity in recent weeks about the prospects for growth at Bristol Airport ... it's a rapidly growing business and currently has a maximum passenger throughput of 10m per year ... but is preparing a plan to submit to NSC to bring that figure up to 20m per year by the mid 2040's with the creation of more than 10,000 jobs by that date. As others have said before me this is England's 3rd largest regional airport and the 5th busiest outside London, flying to 126 destinations.</p> <p>Access to the Airport is mainly via the A38 whether from the north or south, this is only a single carriageway road, or the Airport is approached by narrow country roads from the west (via Brockley Combe that becomes Downside Road) or from the east (along West Lane and Felton Lane) via Winford and other small Somerset villages.</p> <p>Bristol Airport is the largest UK Airport without access by one or more of motorway, dual carriageway or direct rail links. Even smaller airports like Newcastle, Liverpool and East Midlands have far better transport links.</p> <p>But against this ambitious expansion plan there aren't any proposals for dealing with improvements to the transport systems to meet this expansion but there will inevitably be huge impact on local roads and this has not been adequately addressed.</p> <p>No doubt Councillors and their senior officers in NSC are sifting through the numerous comments that have been made during the recent Consultation Period about these and others related issues ... but once again we don't seem to know where we're going with this whole issue ... expansion seems inevitable but there's no apparent plan ... well at least not in the public domain ... other than that outlined in the WECA "Transport Vision".</p>	
Parish Councils Airport Association	Parish Councils Airport Association	<p>The PCAA are very disappointed with the Council's wording of this consultation in respect of Bristol Airport. North Somerset Council has a duty of responsibility to residents of North Somerset to give a balanced approach to proposed development. The opening paragraph states the economic benefits but does not state one economic disbenefit such as the tourist deficit. Secondly, nowhere, not even in the climate change section of this document, is there recognition of the environmentally harmful activity of flying. And lastly not one of the options states the impacts on residents. The immediate growth to 12 mppa has not highlighted that there is a 50% increase in growth since 2017 in which the airport reached 8.2 mppa.</p> <p>The PCAA support Option 1: Retain the Existing Policy as to date there is the only policy which can guide further development at the airport. This policy is CS 23 in the North Somerset Council Core Strategy Jan 2017. This states '<i>Proposals for the development of Bristol Airport will be required to demonstrate the satisfactory resolution of environmental issues, including the impact on surrounding communities and surface access infrastructure</i>'. The West of England JSP has all but ignored growth at Bristol Airport and the NS Local Plan 2036 in its infancy.</p> <p>The PCAA support Option 1 for the following reasons:</p> <p>With growth beyond 10 mppa there will be no respite from ground and air noise during the day. And Bristol Airport has made it clear that it wishes to change the night movement limit which will allow more air transport movements in the summer months. This will have an adverse impact on residents under the flight path.</p> <p>Above 10 mppa there will be increased congestion on rural roads and the A38 and A370. Any road improvements shown in the Joint Spatial Plan will not occur until at least 2025.</p> <p>There will be a growth in carbon emissions and, to date, the Joint Spatial Plan and this local Plan have not stated how a further increase in emissions fits within sustainable development and the Climate Change Act 2008.</p> <p>The PCAA do not support Option 2</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		The PCAA do not support Options 3 and 4, which removes the Airport area from the Green Belt and allocates land for expansion now and in the future due, to the many uncertainties surrounding issues such as: road improvements, delivery of light rail, the likelihood of electric autonomous cars to reduce the need for land take and to free up space from car parking. Lastly, the impacts on the environment are uncertain and unknown.	
Portishead Town Council	Portishead Town Council	That there should be a specific policy for each of the Royal Portbury Dock and Bristol Airport. Support intensification within Royal Portbury Dock footprint and to propose enhanced links to Avonmouth and Severnside.	
R Wood		Bristol Airport has always been located at the wrong location (should've been at Filton)and further development should be strictly limited There is yet again the same problem of no proper Infrastructure - country roads are permanently clogged - Traffic is really busy on Nailsea Wall Netherton Wood & Chelvey Lanes they will continue to destroy the countryside & the environment with their proposals	
Stowey Sutton Parish Council		Stowey Sutton Parish Council support Option 1 for the following reasons: With growth beyond 10 mppa there will be no respite from ground and air noise during the day. And Bristol Airport has made it clear that it wishes to change the night movement limit which will allow more air transport movements in the summer months. This will have an adverse impact on residents under the flight path. Above 10 mppa there will be increased congestion on rural roads and the A38 and A370. Any road improvements shown in the Joint Spatial Plan will not occur until at least 2025. There will be a growth in carbon emissions and, to date, the Joint Spatial Plan and this local Plan have not stated how a further increase in emissions fits within sustainable development and the Climate Change Act 2008. Stowey Sutton Parish Council do not support Options 2, 3 & 4 due to the many uncertainties surrounding issues such as: road improvements, delivery of light rail, and the impacts on the environment are uncertain and unknown.	
Taylor Wimpey - The Vale		No further comments are made in relation to the Airport aside of those above in relation to fair and equal assessment of Green Belt.	
The Belmont Estate	Ridge and Partner LLP	The Estate is extremely concerned regarding any potential expansion of Bristol Airport. The Estate is of the opinion that such a proposal would be significantly environmentally damaging through both noise and air pollution as well as specifically the increased number of trips that would be associated with any expansion (not least in light of the strain that the proposed SDLs risk causing to the road network). The National Planning Policy Framework (NPPF) stresses the importance of the planning systems environmental role to minimise pollution. In particular, the NPPF states that:	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p><i>'181. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.'</i></p> <p>Therefore any such expansion needs to be carefully considered against the benefits and disbenefits.</p>	
Tom Leimdorfer		Support Option 1 for retaining existing policy and carefully scrutinising any application for airport expansion to see if it meets the criteria for very special circumstances. Any move to give carte blanche for Bristol Airport expansion is environmentally damaging for the whole area with only limited gains in employment.	
WENP	West of Engln Nature Partnership	<p>Whilst acknowledging the importance of the Airport for the West of England region, expansion should be in line with the principles of sustainable development and sustainable modes of transport.</p> <p>Bristol Airport is situated near to ecologically sensitive and valuable sites including Goblin Combe (SSSI) and King's Wood and Urchin Wood (SSSI). Any adverse impacts on these important sites and the wider ecological networks that support them must be understood, avoided and mitigated as appropriate. We would support a strategic solution for mitigation that best supports the natural environment at the landscape scale, and delivers net gains in biodiversity.</p>	
Wessex Water (Ruth Hall)	Wessex Water	Wessex Water have an existing Sewage Treatment Works (STW) which is located to the north of the airport (350142, 166084). Development should not take place in proximity to the STW where there is a risk that future occupiers may be affected by the treatment of sewage and associated odour, noise and insects. The land safeguarded in Option 3 and allocated in Option 4 falls within the Odour Consultation Zone of the STW. Wessex Water strongly advise that the boundary of the proposed safeguarded/allocated area is redrawn to take it outside of the odour consultation zone of the STW.	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	Support the views expressed in the Parish Councils' Airport Association response to WoE Transport Topic Paper 8 update dated November 2018 against further expansion of Bristol Airport and wishes any development of and around the airport to be under tight control. For this reason Option 1 is strongly supported.	
Wrighton Parish Council	Wrighton Parish Council	Option 1 is preferred in order to best control airport growth aspirations, which growth has yet to be seen as justifiable in terms of 'mppa'. There should be no loss of Green Belt land without "very special circumstances" first being demonstrated and approved by means of the current planning system. Airport growth aspirations need to be very tightly controlled in order to protect (and preferably enhance) the quality of life of local residents who are already blighted by noise, traffic and light pollution. Projected growth to 20 mppa is not yet proven and it is not therefore appropriate to earmark or otherwise "set aside" land for future expansion at this very early stage.	
Wrighton Village Alliance		Employment - Airport. Option 1 is supported - limiting maximum development is no bad thing and consistent with reducing adverse impacts on climate change. The airport is poorly located with limited public transport links and further development at Exeter or Birmingham should be encouraged instead once the land limits are reached at Lulsgate.	

Respondent Name	Respondent Organisation	Comment	Attached documents
wwarden		<p>It is unfortunate that Bristol Airport (BA) has still to prepare its Master Plan as this would presumably attempt to justify the suggested growth predictions. BA currently has approval for 10m passengers per year and is expected to apply for planning permission to increase this to 12m. BA is not seeking a 'relaxation' but must submit a planning application.</p> <p>BA needs to justify this and, in the meantime, NSC is not in a position to prescribe passenger numbers at the airport. NSC can control BA's operations and potential impacts but can't ensure growth, certainly not in the case of a business in non-UK ownership.</p> <p>Passenger numbers are now over 8m, possibly 8.5m for this year, and still around 1.5m down on the planning permission limit. I note the lack of any reference to climate change in relation to the airport, although the implications of any further significant development could be significant. For example, if airports generally were to plan to double capacity then there would be serious climate and emissions implications, both in terms of aircraft operations and access traffic.</p> <p>Aero engines are reasonably efficient but the problem is that they exhaust at altitude and have a disproportionate impact on the atmosphere. I've worked in aerospace and understand the issues. At the same time there is currently no viable alternative to kerosene (jetfuel) powered engines. Hence, to think of doubling capacity is irresponsible.</p> <p>At the same time, I know there is no basic issue about airport access to and from the south, certainly nothing to justify investment in a new motorway link. This has been stated very clearly by someone who knows, although I'm obviously not intending to quote names.</p> <p>Option 1 is the only justifiable policy approach by NSC. This hasn't prevented airport growth and, as suggested in the Plan document, BA has permitted development rights which facilitate development. Options which impact on third party land should not be contemplated at this stage.</p>	

Document Part Name Q39. Are there any other transport issues or challenges that have been missed? How can they be addressed in the Local Plan?

Respondent Name	Respondent Organisation	Comment	Attached documents
A Vine		<p>The main issue to make communities work is to have a balance of infrastructure, commerce, and residences. As a Portishead resident I consistently witness the favouring of residential developer prosperity over any true town planning, from streets too narrow, inadequate off street parking allowances, postage stamp gardens, tiny rooms in housing, to converting existing commercial concerns and spaces earmarked for commerce to residential use, lack of schools, community services (fire, medical, police, youth groups, etc.). Overhanging all of this lack of a consistent and comprehensive plan and execution thereof is the glaring lack of attention to public transportation.</p> <p>I'm not referring to transportation to Bristol alone, although we all know how abysmal that is. I'm talking about transport interlinking the communities and other transport hubs. For example, it's very difficult to get transport to Southmead Hospital without going all the way into Bristol first. Who wants to travel for over 3 hours for a half hour appointment? Another example is getting to either Yatton or Backwell/Nailsea Station, or getting to any of the other towns and villages outside of W-s-M or Clevedon. We need a much better interlinked transportation NETWORK, desperately so. Electric cars are a pipe dream as far as reducing emissions - we need better public transport. No amount of difficult parking and driving restrictions and congestion will conjure up alternate ways to get to desired destinations.</p> <p>We need the Portishead rail link. In fact, the towns across the entire UK need local links FAR MORE THAN HS2. We need North Somerset politicians steering the government away from large wasteful pet projects and onto the practical local ones that will be used by many more people and will reduce emissions more than the London-centric stuff. The Southwest has so little transport infrastructure it's a nightmare to get anywhere.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Abbots Leigh Parish Council		<p>A recent local survey showed transport and traffic to be the key concern of the local, community – volume, speed, safety, noise, pollution were all highlighted. The A369 bisects the length of the NPA and is heavily loaded throughout most of the day with capacity being filled at peak hours. It seems likely that there will be further traffic growth (population growth around Portishead, toll-free Severn Bridge, possible impact of the South Bristol Link) which will only increase congestion and adversely affect bus speed and reliability. Major development (e.g. at Martcombe) can only exacerbate the problems and diminish the potential for improved public transport towards Bristol (e.g. buses from Portishead)</p> <p>We fully support the measures suggested - tackle congestion by focussing on offering greater travel choice, encourage public transport use by providing realistic and attractive alternatives to the private car through continuing to improve the local bus and rail networks, improve air quality (establish a pollution measurement point close to the A369), respond to climate change.</p>	
Alex		see below	
Aston	Aston and Co UK	<p>The major transport challenges are listed but not the Live-Work units. These can be an effective part of the solution so a specific policy for this is required in the Local Plan. You have recognised the future impact of driverless technologies and smart motorway management. Fibre to the premises is here now and being rolled out in rural areas supported by central Government funding (£200m extra Nov 2018 budget). The Government target is full coverage by 2033 before the end of the replacement plan. A policy encouraging Live-Work units is essential. In the rural areas a Live-Work policy could support economic vitality and reduce commuting.</p> <p>The Brean Down Cycle Way from Uphill to Brean opened in June 2017. One of the next priorities is a link alongside Uphill Road North to Weston, and Weston to Clevedon, which NSC aims to complete in the next two years. After that there is the Gordano Greenway which could be supported by the land being promoted (SHLAA Ref: HE18124) a cycle café in the former stable is being considered and routes indicated in early planning stages run adjacent to the site and could beneficially cross it.</p> <p>A provisional route was safeguarded under the Core Strategy although no final route has yet been decided. NSC's Active Travel Strategy should include this and a specific policy within the replacement plan should support the route and enabling development associated with its creation and operation.</p>	
Avon Wildlife Trust	Avon Wildlife Trust	<p>The transport schemes required to support the development included in this local plan is primarily based on building new roads in very ecologically sensitive areas. The land take required for these new road has to potential to destroy ecological rich habitat in the North Somerset Levels and Moors which provides 3% of the remaining wetland habitat in the UK. These new roads also have the potential to cause significant severance of greater and lesser horseshoe bat commuting routes. These routes are particularly sensitive in this location as they provide links between winter hibernation sites and summer maternity roosts.</p>	
backwell		<p>Bristol is substantially the major site for employment in North Somerset. Any development must be made as near to this potential source of employment as possible. That reduces car miles and makes it more probable people could walk or cycle to work. MetroBus is already active in the City</p> <p>The Plan states that Public Transport provides only 2% of total work trips. The transport improvements identified for North Somerset can only shift this percentage slightly. It is a dream to believe commuters will get on a bike, walk or catch a train. The proposed development at</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Backwell for example is too far from Bristol for walking and for most – to cycle. The trains are infrequent and packed. Buses expensive. I see no suggestions to meet these concerns.</p> <p>A Park and Ride of 550 spaces on the A38 can only attract yet more traffic down the A370 from Weston and Clevedon, driving traffic into the A370 to A38 links. Inevitably, as these routes clog up, the minor routes become rat runs.</p> <p>Re-instating the Portishead link is essential but it has been talked about for years and never happened. Probably the same will happen with all the dreams included in this Plan.</p>	
Barrow Gurney Parish Council	Barrow Gurney Parish Council	<p>The existing public transport infrastructure supporting villages near the airport is not fit for purpose. Despite 4% of these residents using public transport compared with the regional average of 2%, this is still not enough for Bristol Airport and First Bus who have deleted stops and re-routed services to satisfy Bristol residents over the needs of North Somerset residents.</p> <p>Improvements in access to the airport MUST be made before any further development work is undertaken or approved.</p>	
Blagdon PC	Blagdon Parish Council	<p>All the key issues have been recognised but we question the extent to which the most strategic options can or should be delivered within the Local Plan. The inter-connection with the other authorities and the funding demands suggest that the JTS will overtake the Local Plan in most key areas. The Local Plan should perhaps confine itself to the most local elements of any transport strategy.</p>	
Bleadon Parish Council		<p>Although this question relates to the strategic transport issues across the district it is important to note that cycle lanes and pavements connecting villages to services are essential, especially where public transport is limited or non-existent. The majority of Bleadon residents travel to Weston to access services such as doctors, schools, recreation and shopping. Bus services are extremely limited. There are two routes to Weston; the A370 is fast and dangerous for cyclists and walkers, and Celtic Way is equally dangerous because it is narrow with no pavement or cycle lane. Therefore most journeys require a private car or taxi.</p> <p>Reliable and frequent public transport is required if this is to change, along with safer and dedicated cycle and pedestrian routes.</p>	
Bleadon Parish Council		<p>Although this question relates to the strategic transport issues across the district it is important to note that cycle lanes and pavements connecting villages to services are essential, especially where public transport is limited or non-existent. The majority of Bleadon residents travel to Weston to access services such as doctors, schools, recreation and shopping. Bus services are extremely limited. There are two routes to Weston; the A370 is fast and dangerous for cyclists and walkers, and Celtic Way is equally dangerous because it is narrow with no pavement or cycle lane. Therefore most journeys require a private car or taxi.</p> <p>Reliable and frequent public transport is required if this is to change, along with safer and dedicated cycle and pedestrian routes.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Bristol Airport Parking Community Group		<p data-bbox="479 280 943 304">BRISTOL AIRPORT PARKING Communities Group</p> <p data-bbox="479 373 1599 419">Proposals to North Somerset Council for a Strategy to address issues associated with authorised, unauthorised and illegal parking for Bristol Airport</p> <p data-bbox="479 443 1568 489">A consistent strategy on Airport parking is long overdue in order to resolve the current parking chaos and move towards a sustainable and responsible infrastructure for all forms of parking associated with Bristol Airport. We therefore urge North Somerset Council to:</p> <ol data-bbox="517 512 1621 962" style="list-style-type: none"> 1. seek evidence-based analysis of the social and environmental impact of expansion envisaged by Bristol Airport expansion; 2. require the Airport to provide detailed proposals showing how parking will be contained and managed at each phase of development as it moves to a target of 12mppa; 3. require the Airport to complete the North side multi-storey car park (3650) and maximise parking potential through further multi-storey and 'dig-down' options on the existing North site; 4. refuse Airport applications to expand further into the Green Belt land (at the Cogloop or Cornerpool sites or elsewhere) or to erect Multi-Storey Car Parks (MSCPs) on these sites; 5. identify potential Park-and-Ride sites <u>outside the Green Belt</u> with a view to licencing independent operators through an Authorised Operators scheme, so encouraging a competitive approach to off-Airport parking. In addition to consider the option of one or more Council-owned and managed sites (cf the Sovereign Centre). 6. encourage the Airport to work with independent parking operators through partnerships based on, for example, investment, franchise or leasing models; 7. implement the widest range of enforcement measures against illegal operators, working with other public-sector bodies (HMRC, Trading Standards, H&S Executive) and local communities; 8. expand the range of parking restrictions on highways surrounding the Airport with, say, a 2-mile radius. For example: 1 hr in 24 for on-road parking (with resident exemptions). 9. require the Airport to provide drop-off / pick-up and short term parking for private hire transport and taxis; 10. require the Airport to prioritise the provision of civic and community amenities, such as a transport hub. 11. integrate this strategy into a Supplementary Planning Document for the emerging West of England Joint Spatial and Transport Plans. <p data-bbox="479 984 757 1008">In addition, we ask the Council to:</p> <ul data-bbox="479 1031 1599 1238" style="list-style-type: none"> - liaise with other local authorities who have an Airport on a similar scale with reference to parking, or who may be impacted by the presence of an Airport in a neighbouring authority e.g. BANES and, in particular, the Strategic Aviation Special Interest group of the LGA; - provide website advice on Airport parking in North Somerset; - encourage a range of income-generating measures to create community benefit such as public transport options e.g. a congestion charge on Airport traffic. - identify needs and lobby MPs for stronger legislation to support enforcement action against operators who consistently operate illegally; <p data-bbox="479 1260 1621 1307">We recognise the problems facing small local authorities dependent on a few large businesses but urge the Council to scrutinise and quantify the claims of regional benefit embedded in the Airport rhetoric. Decisions need to be based on evidence.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Bristol Port Company	Bristol Port Company	<p>Chapter 8 of the <i>Issues and Options Document</i> deals with Transport. The principal transport issues facing North Somerset are listed, with which the Port agrees. As is acknowledged, landside access for freight to and from the Port is critical to our economic success, likewise staff need to be able to access the Port for their work that is, in most cases, tide-dependent and time critical.</p> <p>Freight traffic tends to use the strategic road network and it is essential that Port traffic can quickly and efficiently reach the M5 and the associated motorways. Congestion at M5-junction 19 can have a devastating impact on our business encouraging customers to consider alternative ports. We engage regularly with Highways England to present our case but consider the Local Plan must also reference the strategic road network and the need for it to function efficiently. We consider that the Local Plan should address the resilience of the M5 River Avon overbridge and the requirement for a suitable alternative should that structure be closed to traffic for a significant duration.</p> <p>We are fully conversant with the benefits of rail transport and it is essential that existing and future customers can utilize the rail links from both Avonmouth Docks and RPO to the national rail network. The Port supports the improvements necessary to encourage greater passenger use but it is essential that those improvements do not affect rail freight movements to and from the Port since such impacts will adversely affect the efficient management and operation of the Port and displace that freight to the road.</p>	
British Horse Society	British Horse Society	<p>The BHS understands the need to find more places to build, according to Government instructions, but at the same time would wish to reduce the impact of these new houses on the countryside and, where possible, improve the network of public rights of way. However, the increased vehicle traffic flowing on from the construction of these new homes, wherever they are built, will have a major impact on other, more vulnerable road users (walkers, cyclists, horse riders, the less able-bodied such as the elderly, disabled and those using mobility scooters etc.), whether they are using the roads for leisure or for commuting. Lanes which would once have been quiet will now become much busier. They will no longer be safe to walk, cycle or ride and this will have an impact on NSC's efforts elsewhere to encourage people into healthy, active lifestyles.</p> <p>However, the BHS feels that by adopting the proposals it makes, NSC will be able to avoid this adverse impact, as well as achieving a much improved network of public rights of way for little or no additional expense to what it already planned, at the same time as helping with healthy lifestyles and tourism. In the following submission, we have used NSC's own main headings.</p> <p>2. North Somerset Wide Issues</p> <p>Throughout the area, there is a very fragmented network of public rights of way and, financially restricted as NSC is, the BHS is well aware that there is precious little money available to improve it. At the same time, NSC is charged with encouraging people to get more exercise. As stated above, the increased traffic following on from the new construction means that walkers, cyclists, horse riders and vulnerable road users – all indulging in healthy exercise – will be more and more at the mercy of traffic and this may result in many people no longer having the nerve to use what would once have been quiet roads for this purpose. It is important that NSC takes into consideration that horse riders in particular make a significant contribution to the economy of North Somerset and keep hundreds of people employed in the more rural areas (vet, farrier, feed merchant, tack shops, livery yards, riding stables etc. etc). In addition, post Brexit, farm subsidy payments seem likely to be based around 'public good', so it makes sense to be sure that vulnerable road users are not deterred, even from using the existing network of rights of way, by the increased traffic.</p> <p>To promote healthy lifestyles and improve local access and rights of way, and comply with the Equality Act 2010, the BHS recommends that NSC makes provision of multi-user access a requirement in all new land development. Specifically, existing footpaths or other rights of way should be augmented to multi-user routes wherever practical. We define multi-user routes as follows:</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>'A multi-user public right of way is one which permits the following groups of vulnerable non-motorised users to use it: walkers, cyclists and horse riders; the exception to non-motorised users is for the use of electric wheelchairs and mobility vehicles to ensure to those with more limited mobility are also included.'</p> <p>Although the term 'multi-user path' has never been defined legally, there is a legal right of way which would encompass all of these vulnerable user groups: bridleways. The BHS suggests that when discussing any new multi-user paths proposed by the Council, or upgrades to existing rights of way, the above definition should be utilised unless there is a compelling reason why it should not, or that the status of bridleway is applied to ensure that all user groups are covered under law. This would both ensure that all vulnerable user groups are catered for and represents the best value for both the public and public money as it applies to the widest possible range of users.</p> <p>The main thrust of the BHS argument is that ALL the new walking/cycle paths which are mentioned in the document should become multi-user paths as defined above. Making multi-user access a specific requirement for all new land development gives NSC a once in twenty years opportunity to upgrade and improve the public rights of way network AT LITTLE OR NO COST TO ITSELF. Multi-user paths represent the best use of public money as they are open to the widest range of users. If time and effort is taken to make sure that these new multi-user paths, which will be sorely needed, are linked in to the existing network, then NSC stands to gain not just in terms of reduced traffic and improved safety, but also in making these new communities pleasant places to live. At the same time, it will be able to promote more tourism and make significant improvements in getting people to adopt more healthy lifestyles. The BHS therefore asks that the planners and developers work closely with both the Council's own Rights of Way Department, the North Somerset Local Access Forum and the BHS to bring about what will be a huge benefit to the area.</p>	
British Horse Society	British Horse Society	Needless to say, good public transport would do much to deter people from driving their cars. The reality, the BHS fears, will be otherwise. However, by adopting the suggestions made in this paper and improving the rights of way network, NSC can help alleviate this.	
Burrington Parish Council	Burrington Parish Council	There are serious contradictions between statements in the Local Plan Issues and Options consultation and the JSP 'technical evidence' published on 12th November 2018, for example in relation to a new M5 Junction 21A and junction improvements at Churchill Gate (A38/A368). There is far too little information about transport improvements to serve the SDLs, mitigate their impacts on local roads, accommodate airport expansion and relieve congestion. Relevant comments are in the attached document in response to the consultation on the JSP's 'technical evidence'.	Responses to the Consultation on JSP Technical Evidence (1).pdf (400 KB)
Butcombe		<ol style="list-style-type: none"> 1. A major omission is lack of reference in the Local Plan Issues & Options to the issue of Bristol Airport surface access congestion and unauthorised parking which has corroded the quality of life of local communities around the Airport. 2. The continuing expansion of Bristol Airport will only exacerbate the existing A38 traffic congestion and the unauthorised parking. The Local Plan must address Airport related traffic congestion rather than wait for the West of England Joint Local Transport Plan which has not yet been finalised. Moreover Joint Transport Study (October 2017) raises the issue of Bristol Airport related traffic congestion but does not offer solutions that can realistically be delivered by 2036. Finally, the Transport Plan does not appear to recognise that unauthorised parking is a function of airport expansion The issue of traffic congestion and parking must therefore be directly addressed in this Local Plan. <p>We particularly highlight the omission of any reference in the Local Plan to the Master Plan consultation undertaken by Bristol Airport, which ought to be a material consideration in this discussion.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p><i>We propose that there should be no further expansion of the Airport at all, let alone into the surrounding Green Belt until these issues are addressed on the basis of evidence. In addition we strongly propose that the Local Plan support a coordinated approach to managing off-site passenger car parking, ideally via a formal Supplementary Planning Document adopted by North Somerset Council and 'bought into' by the Airport.</i></p> <p>We note that one of the key Priority Objectives of the North Somerset Council Core Strategy Jan 2017 is to: <i>Ensure that major development proposals are delivered in tandem with the necessary improvements in physical and social infrastructure such as flood mitigation, healthcare facilities, M5 junction 21 improvements at Weston-super-Mare, junction 19 improvements at Portishead and access improvements to Bristol Airport, and that appropriate delivery mechanisms including effective tariffs/developer contributions are in place.</i></p> <p>This Local Plan avoids addressing any detail on the Council's own priority of 'access improvements to Bristol Airport'.</p> <p>In conclusion, the North Somerset Council Core Strategy Jan 2017 purports to seek development that is 'Living within environmental limits'. The Issues and Options document does not address this</p>	
Butcombe Parish Council	Butcombe Parish Council	<p>As above, we are disappointed that there is no reference to the specific issue of Bristol Airport surface access congestion and unauthorised parking, which increasingly blight the quality of life of local communities in Butcombe and the surrounding villages of Wrington, Cleeve,, Redhill, Winford, Felton and Backwell. The continuing expansion of Bristol Airport into the Green Belt will only exacerbate the existing A38 traffic congestion and the inappropriate unauthorised parking in the local rural landscape</p> <p>It is not acceptable for the Local Plan to duck addressing Airport related traffic congestion by hiding behind the smokescreen of the yet-to-be-completed West of England Joint Local Transport Plan: the issue of traffic congestion and parking must be directly addressed in this Local Plan.</p> <p>We particularly highlight the omission of any reference in the Local Plan to the current Master Plan consultation currently being undertaken by Bristol Airport, which ought to be a material consideration in this discussion.</p> <p>Butcombe Parish Council propose that there should be no further expansion of the Airport at all, let alone into the surrounding Green Belt, until this transport 'elephant in the room' is recognised and addressed. In addition Butcombe Parish Council would like to see the Local Plan support a coordinated approach to managing off-site passenger car parking, ideally via a formal Supplementary Planning Document adopted by North Somerset Council and 'bought into' by the Airport.</p> <p>We note that one of the key Priority Objectives of the North Somerset Council Core Strategy Jan 2017 is to: <i>Ensure that major development proposals are delivered in tandem with the necessary improvements in physical and social infrastructure such as flood mitigation, healthcare facilities, M5 junction 21 improvements at Weston-super-Mare, junction 19 improvements at Portishead and access improvements to Bristol Airport, and that appropriate delivery mechanisms including effective tariffs/developer contributions are in place.</i></p> <p>This Local Plan avoids addressing any detail on the Council's own priority of 'access improvements to Bristol Airport'.</p> <p>In conclusion, the North Somerset Council Core Strategy Jan 2017 purports to seek development that is 'Living within environmental limits'. The Issues and Options document does not address this.</p>	
C Twine		<p><i>Transport Infrastructure</i></p>	

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		<p>We are also concerned by the significant reliance upon a series of strategic development locations (particularly Banwell and Churchill) given the overall cost of delivering the associated transport programme. The Transport Topic Paper 8 (WED007) indicates that the total cost to deliver the transport works for the SDL's is estimated to be between £1-1.4 billion and this would be "an ambitious programme and would represent a step-change in the level of investment from that achieved in the last two decades". For the Banwell and Churchill components this is estimated as being between £180-185million.</p> <p>As the Topic paper makes clear "in most cases, it is anticipated that the transport schemes will be completed either in advance of or during the early phases of housing build-outs in the relevant SDL's". Such a conclusion is not surprising given the standard of existing infrastructure and its ability to accommodate major strategic growth.</p> <p>Whilst, we do not object to the Councils pursuing ambitious programmes of work we remain sceptical that all works will receive funding (and it is understood none benefit from committed funding at present) and even if they are funded the associated timescales are likely to be significantly longer and therefore implementation and build outs will be significantly longer than currently envisaged and by consequence delivery of residential units will be over a much longer time horizon than currently anticipated i.e. all units complete by 2036 (except 125 dwellings).</p> <p>It is our position therefore that the total requirement flowing out of the JSP will increase as will North Somerset's contribution and that the Council should reduce its dependency on infrastructure heavy strategic development locations within this plan period. As a result, we consider the distribution for non-strategic development locations should increase and sites such as that controlled by my client should be actively considered.</p>	
Chris Butler		<p>Re-establish smaller train stations, make public bus transport free (or massively subsidised) and enforce large freight by rail to solve increased traffic congestion, parking issues and environmental pollution. Pavements and foot/cycle paths are overgrown and littered, enforce legal duties to maintain them for more pleasant and safer sustainable travel. Reduce and enforce speed limits to also make use of highways safer for cyclists.</p>	
Cleeve Parish Council	Cleeve Parish Council	<p>CPC considers that the proposed NSC Local Plan will only increase congestion due to further expansion at Bristol Airport and housing developments being developed in the wrong locations. This has the knock on impact of increasing carbon emissions.</p> <p>The Local Plan needs to consider major changes due to its unsustainability. If the airport cap remains at 10 mppa the upgrade in infrastructure would be vastly reduced. The Bristol Transport Strategy July 2018 shows that '<i>building more roads leads them just to be filled up, with buses then caught in congestion</i>' and a recognition that underground light rail systems is more than twenty years away. We have seen the constant delay of Portishead railway and so cannot see that a rail link will materialise to Bristol Airport. A mass transit may well not cause the behavioural change necessary to be successful with the vast percentage of passengers still travelling by car.</p> <p>CPC will comment on the four potential park and ride sites situated in Green Belt once the transport studies have been made available.</p>	

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Congresbury Parish Council	Congresbury Parish Council	<p>We are pleased to see North Somerset Council recognising the impact of congestion is costing the local economy and impacting on health. However this section is very brief and does not fully explore the issues on all strategic roads through North Somerset area. No details of A370, limited info on A38 (only with new link with M5 via the new garden villages), no details of B road congestion for example the B3133 via Congresbury. We are disappointed to see no details on possible ways to tackle Weston-super-Mare traffic problems that can impact on the A370. There are no details on better linking Weston-super-Mare and Clevedon as well as Portishead. This section needs fully developing and acknowledgement that over the next 20 years major investment is required in North Somerset roads to fulfil access to employment and trade. The focus for this section seems only related to the new garden villages, new junction on the M5 and very sparse details of improvements to Bristol airport. This is a serious lack of detail about generating new sustainable transport options. For example re-generation of local train services, improving bus provision, improving road network as well as new park and ride schemes for locations such as Weston-super-Mare . We recommend North Somerset Council undertake a full and comprehensive review of transport issues and truly develop a strategy for the 2030's.</p>	
CPRE Avonside	CPRE Avonside, North Somerset District	<p>Transport issues listed on page 80 of the consultation set out exactly why plans should concentrate on mass transit and public transport. Shifts in behaviour and a travel that requires us to be more active can have a positive impact on our health.</p> <p>CPRE report - The end of the road? attached, provides evidence that road building is not the answer.</p>	<p>CPRE Report - The End of the Road 2017.pdf (4.8 MB)</p>
Diane		<p>Transport issues:</p> <p>Public health issues: add a reference to nitrogen dioxide as a major contributor to poor air quality. Expand the statement to include noise, dust and vibration from congested roads and noise from air traffic as public health issues.</p> <p>Shift in behaviour: add a reference to increased frequency of air travel.</p> <p>Port and airport: proposals for improved transport system must mitigate impact on public health, environment and quality of life in local areas.</p> <p>How will the local plan address these challenges:</p> <p>Second bullet point - encourage public transport: add a reference to improving the frequency, routes, connectivity, reliability, passenger experience and pricing of bus and rail services.</p> <p>Third bullet point – support new technologies: add a reference to maximising access to reliable superfast broadband for homes and businesses. This will promote increased telecommuting, thereby reducing congestion and pollution.</p> <p>Rail (p83):</p> <p>Provision of rail access to the airport. Is it suggested that this could be achieved within the plan period to 2036? If so, please expand on the proposals for this. It is assumed that this refers to a new link to the railway line through Bedminster, but it is unclear why this would be required in addition to the Mass Transit. Connectivity to rail network <u>via</u> the Mass Transit, as described under Bristol South West Economic Link Study,</p>	

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		<p>fourth bullet point, seems much more feasible. There is no viable route for a new railway line between the airport and Nailsea and Backwell railway station, mainly due to the terrain. A new line between the airport and Yatton railway station might be feasible but would have to follow a circuitous route at massive cost and with massive impact on the environment and landscape. Total journey times to get to or from Bristol Temple Meads via this route would almost certainly rule it out.</p> <p>Park and Ride South Bristol. I support the proposed park and ride facility close to the A38/South Bristol Link roundabout.</p>	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	<p>A recent local survey showed transport and traffic to be the key concern of the local, community – volume, speed, safety, noise, pollution were all highlighted. The A369 bisects the length of the NPA and is heavily loaded throughout most of the day with capacity being filled at peak hours. It seems likely that there will be further traffic growth (population growth around Portishead, toll-free Severn Bridge, possible impact of the South Bristol Link) which will only increase congestion and adversely affect bus speed and reliability. Major development (e.g. at Martcombe) can only exacerbate the problems and diminish the potential for improved public transport towards Bristol (e.g. buses from Portishead)</p> <p>We fully support the measures suggested - tackle congestion by focussing on offering greater travel choice, encourage public transport use by providing realistic and attractive alternatives to the private car through continuing to improve the local bus and rail networks, improve air quality (establish a pollution measurement point close to the A369), respond to climate change.</p>	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	<p>8 Transport</p> <p>A recent local survey showed transport and traffic to be the key concern of the local, community – volume, speed, safety, noise, pollution were all highlighted. The A369 bisects the length of the NPA and is heavily loaded throughout most of the day with capacity being filled at peak hours. It seems likely that there will be further traffic growth (population growth around Portishead, toll-free Severn Bridge, possible impact of the South Bristol Link) which will only increase congestion and adversely affect bus speed and reliability. Major development (e.g. at Martcombe) can only exacerbate the problems and diminish the potential for improved public transport towards Bristol. (E.g. buses from Portishead)</p> <p>We fully support the measures suggested - tackle congestion by focussing on offering greater travel choice, encourage public transport use by providing realistic and attractive alternatives to the private car through continuing to improve the local bus and rail networks, improve air quality (establish a pollution measurement point close to the A369), respond to climate change.</p>	
Environment Agency	Environment Agency	<p>A new park and ride is proposed close to Junction 21 of the M5. This would need to avoid fluvial floodplain, unless floodplain compensation is proposed.</p>	
Environment Agency	Environment Agency	<p>Any other new roads, Metrobus and transport improvements would need to avoid fluvial floodplain and ensure floodplain connectivity.</p>	
F Parry		<p>Tourist cycle plans are a distraction. Nothing in the Local Plan addresses how funding will be found for these major transport infrastructure changes. If housing developers are allowed to go ahead without infrastructure improvements we will be landlocked like Portishead with too many households for the space available on the roads. Drastic improvements to public transport would likely be insufficient.</p>	

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		Nowhere is it mentioned how the single lane bottleneck into Bristol on the A370 would be addressed, which begs the question where will the 700 Backwell and 2575 Nailsea households find employment?	
FF		Safer cycling routes that take cyclists off the roads should be prioritised from Nailsea and Backwell into Bristol. Some great routes already exist and further development would encourage greater adoption, from both a recreation & leisure as well as a commuting perspective.	
FH		To disproportionately increase the number of houses in Nailsea and Backwell does not consider the full environmental impact of creating large residential zones significantly distant from the large employment centre of Bristol. The proposed paltry transport options of an additional bus route and link roads are mid 20 century solutions that will further impact the current crisis of air pollution and flooding. A realistic plan for the future of North Somerset and Bristol would start with a proper public transport strategy enabling the current residents to commute to and from work in a timely manner without spending at least 50% of their commute in congested traffic. Only when a sustainable transport plan across the region is in place can NSC consider the development of new houses by homebuilders such as Taylor Wimpey.	
FH		A cohesive transport plan is essential for the future development of the region. Without this, the long term economic viability of the region will not achieve its potential. Currently the fare policy in the region does not support the use of public transport from North Somerset into Bristol, and thus increases the current single occupancy cars. However, transport plans should consider reinstating some light rail options and not just depend on bus transport. Numerous park and ride sites similar to Oxford should be in place and reduce commuter traffic from the main access routes into Bristol.	
Flax Bourton Parish Council	Flax Bourton PC	<ul style="list-style-type: none"> • There is insufficient assessment and feasibility studies of the funding and viability issues of delivering the full transport vision which goes to the heart of the soundness of the plan. • The concerns raised by the potential operators of the MetroBus have not been addressed. We refer to the submission on behalf of Stagecoach West to the JSP consultation on the Transport Vision. This submission questions the decision making for the Strategic Development Locations and the deliverability of the Transport Vision. It urges the undertaking of feasibility studies, we quote directly as follows; "we urge feasibility studies on all MetroBus corridors which clearly has not been done by North Somerset Council". • Flax Bourton Parish Council believes the timing of the Local Plan – Issues and Options Consultation is premature given the Joint Spatial Plan (JSP) is still at a very early stage of development. It does not believe it is possible to move to the next stage until the JSP has been tested in a public forum in May 2019 and the Joint Transport Plan 4 is available for consideration in early 2019. In addition, the BRSWEL Study, the output of which is believed to be important, has not yet been made available. Also there is no study/report of railway capacity from Railtrack or train operating companies. • The transport mitigation in the plan does not deal with the sheer scale of the proposed housing development. 	
Geoff Fox		We all need more deliverable plans to improve transportation across North Somerset and in Portishead in particular. Please improve the roads and public transport.	

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GVA Grimley	GVA Grimley	The key concern of St Modwen is the extent to which the Council's high parking standards reduce site development density which has been a real issue on the development phases to date at Locking Parklands. The Local Plan will need to carefully address the balance between parking standards and the issues set out within the transport section and the density aspirations elsewhere in the document.	
H Parry		<p>The areas for strategic development outlined in the proposals will result in an increase in commuting on already overstretched infrastructure. The 'knock-on' effect for key entry points to Bristol (such as Cumberland Basin) would be significant. North Somerset Council has not committed to a 'Greenbelt Review' which could identify some alternative, more sustainable sites for development, closer to Bristol where the majority of the region's employment is centred.</p> <p>This would result in significant capital savings since proposed sites closer to Bristol (such as The Vale) have significant infrastructure already on the doorstep (roads and MetroBus), along with means to support achievable sustainable transport (walking, cycling) to nearby services and employment opportunities.</p>	
Hallam Land Management Ltd (David Lock Assoc)		HLM broadly agree with the scope of transport issues and challenges identified, particularly in relation to supporting the strategic road network within regional growth corridors, as well as the need to regenerate the key towns and to encourage public transport use. HLM wish to iterate that strategic development of the Land East of Clevedon can play a significant role in delivering multi-modal transport enhancements along a Bristol-Backwell-Nailsea-Clevedon growth corridor, greatly reducing local traffic along this section of the M5, whilst boosting inter-connectivity between the towns and SDLs, and contributing to town centre regeneration through enhanced public transport and increased footfall.	
Hayes Family and Mr Cope		We have no particular comments to make at this stage other than to reiterate that whilst we are supportive of the provision of J21A further consideration needs to be given to the location of this junction to ensure it does not impede on the delivery of land west of the M5, Locking, for housing and associated infrastructure, particularly because at the time this is an intangible proposal with no detail or funding in place to ensure delivery within the JSP plan period.	
Highways England	Highways England	<p>Highways England are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises parts of the M5. It is on the basis of these responsibilities that the comments that follow in this letter have been made.</p> <p>We are generally interested in the potential traffic impacts of any development site proposals and/or policies coming forward through the Local Plan and need to ensure that these are fully assessed during the plan-making stage. It is imperative to identify any improvements needed to deliver aspirations at this early stage, as set out in Government policy:</p> <p>Paragraph 12 of Circular 02/2013 states that '<i>The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.</i>'</p> <p>Paragraph 15 states that '<i>In order to develop a robust transport evidence base [for local plans], the Agency (now Highways England) will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and</i></p>	

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		<p><i>individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety.</i>’ Page</p> <p>Paragraph 18 states that <i>‘Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency (now Highways England) will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.’</i></p> <p>Responses to Local Plan consultations are also guided by other pertinent policy and guidance, namely the NPPF and the <i>‘Highways Agency and the Local Plan Process’</i> protocol – now applicable to Highways England.</p> <p>The National Planning Policy Framework 2018 (NPPF) sets out that plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and statutory consultees. (para 16).</p> <p>Transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impact of development on transport networks can be addressed. (para 102).</p> <p>The planning system should actively manage patterns of growth such that significant development is focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. (para 103)</p> <p>Planning policies should be prepared with the active involvement of highways authorities and other transport infrastructure providers so that strategies and investments for supporting sustainable transport and development patterns are aligned. (para 104).</p> <p>Planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use. (para 122).</p> <p>In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. (para 109).</p> <p>Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (including transport). Such policies should not undermine the deliverability of the plan. (para 34)</p> <p>Highways England’s protocol document entitled <i>“The Highways Agency and the Local Plan process - A Protocol for Local Authorities, Developers and the Highways Agency”</i> confirms that Highways England will work with local planning authorities to identify the infrastructure requirements of the overall allocation.</p> <p>In summary; in order for the transport evidence base to satisfy the requirements of NPPF and Circular 02/2013, it is necessary to establish:</p> <ul style="list-style-type: none"> • The cost of the necessary improvements. • The improvements necessary to ensure that the impacts are not severe. • The transport impacts of the development allocations. • Any land required for the delivery of the necessary improvements 	

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		<ul style="list-style-type: none"> Any other deliverability constraints. <p>Paragraphs 9 and 10 set out the approach that Highways England takes in relation to development proposals as follows:</p> <p>"9 Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.</p> <p>10. However, even where proposals would not result in capacity issues, the Highways England's prime consideration will be the continued safe operation of its network".</p> <p>Applying the principals of paragraph 9 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section that is already operating at over-capacity levels, or cannot be safely accommodated, i.e., a development which adds traffic to a junction which already experiences road safety issues; would increase the frequency of occurrence of road safety issues; or would in itself cause those road safety issues to arise, would be considered to have a severe impact.</p> <p>Our comments relating to the Issues and Options Document are as follows:</p> <p>Background</p> <p>The West of England Authorities (North Somerset, Bristol City, Bath and North East Somerset and South Gloucestershire) are preparing a Joint Spatial Plan (JSP) covering the four administrative areas. The JSP will identify the needs for housing, employment and key infrastructure for the Plan period (2016-2036) and the broad strategy for its delivery. Highways England is currently preparing a response in respect of the JSP revised evidence base consultation, which ends in early January 2019.</p> <p>North Somerset Council is required to review and update their existing local plan alongside the emerging JSP in order to provide detailed guidance to support its implementation.</p> <p>The submitted JSP currently identifies a need for 102,200 homes across the plan area by 2036, with North Somerset apportioned 25,000 new homes. Of these, 13,932 dwellings are committed in existing plans (to 2026) or benefit from existing consent. The Issues and Options Document sets out that the remaining housing requirement will be met through 'Urban Living' (defined as brownfield opportunities in urban areas), strategic development locations (sites of 500+ dwellings specifically identified in the JSP) and smaller sites (non-strategic growth comprising sites of less than 500 dwellings to be identified through local plans).</p> <p>The purpose of the Issues and Options Document (I&OD) is to identify the issues which need to be addressed and to seek initial feedback and on a range of proposed alternatives. We acknowledge that at this stage of the Local Plan process, stakeholder's views on the emerging issues and options of distributing and managing future development are requested. Comments regarding this strategy are set out below.</p> <p>North Somerset Issues</p> <p>We are broadly content that the key highways and transport issues affecting growth and development across North Somerset have been identified at a high level, including how to encourage self-containment, how to improve access to jobs and services, how to provide for sustainable travel and how to phase the delivery of infrastructure, including transport. Highways England has previously raised these as critical issues to be addressed in the emerging JSP.</p>	

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		<p>However, we note that whilst the issue of congestion on the M5 corridor has been identified for the Weston-super-Mare broad location, this has not been identified as an issue for the Central Parishes or Mendip Hills broad location, or for any of the other development locations along the corridor. This is inconsistent with the findings of the emerging JSP evidence base (as of November 2018), and should be identified as an issue that would need to be addressed by the Local Plan if the development strategy were to result in a severe adverse impact.</p> <p>transport</p> <p>Highways England welcomes the identification of ‘transport issues facing North Somerset’. In particular,</p> <ul style="list-style-type: none"> • the impact on local roads of issues on the SRN is acknowledged, and reinforces our own belief that a SRN operating within capacity helps ensure that incidents are kept to a minimum; and • Employment locations and regional growth corridors: The Strategic Road Network (SRN) is vital to economic success and so the challenge will be maintaining both its function and access to it from the local network • We note that the approach to addressing the identified strategic highway and transport challenges will be to develop the Joint Local Transport Plan (4), which will be informed by the JSP and associated Joint Transport Study. We also note the reference to the BSWE L study potentially delivering a ‘step-change’ in network intervention including a strategic road connection between the M5 at a ‘new junction 21a and Langford’. It is not clear from the reference to the BSWE L study whether this will be used to inform the Local Plan transport strategy. We would welcome further clarification in this respect. <p>It is our understanding that it is the higher tier strategic plan (the JSP) that identifies the strategic locations for development, a suite of strategic development management policies and the provision of necessary infrastructure. As the ‘second tier’ plan, the North Somerset Local Plan must comply with and seek to deliver the policies and proposals of the JSP, with the purpose being to provide more detailed and locally specific planning policies to guide decisions on planning applications and identify local-level site allocations. To this end, we would welcome further discussion as the local plan is developed to understand how the local plan will bring into policy the necessary strategic highway mitigation to ensure that the impact of planned local development on the SRN is not severe, particularly if this is not identified in the JSP (November 2018).</p> <p>We look forward to continuing to work collaboratively with the Council through the development of the Local Plan to assess the impact of proposed development allocations on the SRN, and the local road network, to seek to ensure that the impact of traffic from the proposed allocations on the SRN is safely managed, such that economic growth in North Somerset and the wider south west region is not curtailed.</p>	
J Gower-Crane		<p>(8. Transport) Keep Bleadon parish as an infill and encourage people to use it for recreational purposes improving mental and physical health and well-being and protect local wildlife and agriculture industry from housing and industrial over-development. Improve local bus transport also in relation to rail travel times so that they can be used to commute effectively.</p> <p>New cycle route through Bleadon levels to Brean was created. Keep Bleadon settlement boundary and protect the levels for recreational and environmental purposes.</p> <p>Strategic cycle routes - Reduce the speed on the A370 through Bleadon into/from WSM to encourage cycling. Maintain the footpath alongside the A370 to encourage local and tourist pedestrians.</p>	
J Rodway	Butcombe Parking Group	<p>As above, BAPCoG is disappointed that there is no reference to the specific issue of Bristol Airport surface access congestion and unauthorised parking in the Local Plan Issues & Options, which increasingly blight the quality of life of local communities in Butcombe and the surrounding</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>villages of Wrington, Clevee,, Redhill, Winford, Felton and Backwell. The continuing expansion of Bristol Airport will only exacerbate the existing A38 traffic congestion and the inappropriate unauthorised parking in the local rural landscape It is not acceptable for the Local Plan to duck addressing Airport related traffic congestion by hiding behind the smokescreen of the West of England Joint Local Transport Plan. Not only has this has not yet been finalised but in addition, although the Joint Transport Study (October 2017) raises the issue of Bristol Airport related traffic congestion, it does not offer any solutions that are realistically capable of being delivered by 2036. In addition, the Transport Plan does not appear to recognise that unauthorised parking is a function of airport expansion The issue of traffic congestion and parking must therefore be directly addressed in this Local Plan. We particularly highlight the omission of any reference in the Local Plan to the current Master Plan consultation currently being undertaken by Bristol Airport, which ought to be a material consideration in this discussion.</p> <p>BAPCoG propose that there should be no further expansion of the Airport at all, let alone into the surrounding Green Belt, until this transport ‘elephant in the room’ is recognised and addressed. In addition BAPCoG would like to see the Local Plan support a coordinated approach to managing off-site passenger car parking, ideally via a formal Supplementary Planning Document adopted by North Somerset Council and ‘bought into’ by the Airport.</p> <p>We note that one of the key Priority Objectives of the North Somerset Council</p> <p>Core Strategy Jan 2017 is to: <i>Ensure that major development proposals are delivered in tandem with the necessary improvements in physical and social infrastructure such as flood mitigation, healthcare facilities, M5 junction 21 improvements at Weston-super-Mare, junction 19 improvements at Portishead and access improvements to Bristol Airport, and that appropriate delivery mechanisms including effective tariffs/ developer contributions are in place.</i></p> <p>This Local Plan avoids addressing any detail on the Council’s own priority of ‘ <i>access improvements to Bristol Airport</i>’.</p> <p>In conclusion, the North Somerset Council Core Strategy Jan 2017 purports to seek development that is ‘Living within environmental limits’. The Issues and Options document does not address this.</p>	
jerb44		<p>The proposed new link road between the M5 and A38 is likely to draw traffic bound for Bristol airport and the M4 eastbound. This easier access will increase demand for flights at Bristol airport from people living to the south and thus substantially increase aircraft originating pollution. It will also add to the commuter traffic expected from the increased housing and thus substantially increase the light and noise pollution of the proposed housing sites.</p>	
John Miners		<p>The M5 is not fit for purpose particularly around junctions 19-21. Friday afternoon at junction 20 is one long car park. Some Residents of Nailsea & Clevedon whose route to and from work includes these sections of the M5 are known to be relocating to North Bristol.</p>	
KMH1		<p>The proposals are a failure in considering transport to sustainably serve the proposed garden villages. Additional trips will be attracted to Bristol not Weston. Where is AP Rees and Ashton's plans for jobs growth in the local area, to avoid more pollution building up on corridors to and in Bristol?</p>	
KRG22		<p><u>Local plan 2036 Issues and Options consultation comments re Transport</u></p>	<p>Transport plan comments.pages (374 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>As someone who lives in Nailsea and has commuted to Bristol for 20 years I think I am reasonably well placed to comment on the transport proposals and the issues outlined here.</p> <p>I believe that the statement fails to recognise the realities of commuting life or that however much encouragement there is to create employment in Nailsea the simple fact is that most people will live here to commute to work in Bristol. Planners are too reliant on a utopian world where people walk, cycle or use public transport to get to work. Unfortunately the rest of us have to live in the real world, where car reliance remains very high.</p> <p>For evidence of this just look at Portishead where development has raced ahead of any suitable infrastructure improvements and where parked cars permanently block the roads because of insufficient space allocated to parking. The promised railway link never happened and is not even likely any time soon.</p> <p>I see scant acknowledgement of reality and nothing other than lip service in these plans to getting people out of their cars. There may have been a small statistical drop in car use of 6% but that still means that a large % of the new house owners will commute by car.</p> <p>Mention is made of extending Metrobus to Backwell, and of improving the Train Station, to which I would comment -</p> <ol style="list-style-type: none"> 1. Buses from Backwell will share the A370 road with all the cars travelling into Bristol, and the delays approaching the Cumberland basin, before they can leave the A370 and use the new Metrobus river crossing past long Ashton, so there is no motivation for car drivers to switch to sit on an uncomfortable, slow and expensive bus journey. 2. Where is all the car parking going to come from for people catching the bus at Backwell? It is totally unrealistic to think people will walk or ride bikes to catch the bus, a few will, the majority won't. 3. The Train station facilities at Backwell desperately need improving but there is no point if there is not enough parking, the car park was expanded a few years ago and yet still overflows into local roads. How will the extra numbers park their cars, see point above re Metrobus. 4. Potentially acres of space at Backwell will have to be found for car parking to service these transport hubs. Where? 5. I caught the train for 10 years from Backwell into Bristol, but it was never a pleasant journey with frequent overcrowding, unreliable timing, and far too few peak time services. There is no mention here as to whether the Train franchise operator has bought into putting on more trains. 6. Any improvement to Nailsea and Backwell station will suck in more car driving commuters from farther afield, Clevedon, Portishead, Yatton, Bridgewater, Taunton, who don't want to pay for a train ticket for a longer journey. This is a fact as I used to sit on the train with people who drove to Nailsea as it is the the last main station with car parking before Temple Meads, and it's why the new car park at Backwell almost overnight became far more full than forecast. <p>The plan also fails to add sufficient recognition to issues arising from wider transport problems in the Bristol area, outside of North Somerset, in particular the reliance on just two main crossings for the River Avon, the M5 bridge and the Cumberland basin A370 complex. Let's disregard the Clifton suspension bridge as it's future lifespan must be uncertain for volume traffic. Thousands of houses built in and around Nailsea means thousands more car journeys across these restricted routes into Bristol which are already congested to capacity at peak hours, and gridlock if there a crash on the M5. Another river crossing is needed to take local traffic away from the M5 bridge.</p> <p>The local plan cannot exist in isolation when the area in question is a commuter belt for a major city, it has to be a joined up approach and I'm not convinced that is the case.</p> <p>It is my belief that these are the issues which will be the main barrier to building the projected number of houses in the Nailsea / Backwell area and I see no realism in the plans to address the likely impact of the increased numbers of commuters living here. The infrastructure must be</p>	

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		sorted out first before development starts and if it takes as long as the Portishead railway line to put in place then the plan will fail to deliver houses in the timescales expected.	
Libbyrich		Proposals to improve access to Bristol and Severnside avoiding junction 19 should be promoted.	
Local Access Forum	Local Access Forum	<p>The LAF understands the need to find more places to build, according to Government instructions, but at the same time would wish to reduce the impact of these new houses on the countryside and, where possible, improve the network of public rights of way. However, the increased vehicle traffic flowing on from the construction of these new homes, wherever they are built, will have a major impact on other, more vulnerable road users (walkers, cyclists, horse riders, the less able-bodied such as the elderly, disabled and those using mobility scooters etc.), whether they are using the roads for leisure or for commuting. Lanes which would once have been quiet will now become much busier. They will no longer be safe to walk, cycle or ride and this will have an impact on NSC's efforts elsewhere to encourage people into healthy, active lifestyles.</p> <p>However, the LAF feels that by adopting the proposals we make, NSC will be able to avoid these adverse effects, as well as achieving a much improved network of public rights of way for little or no additional expense to what is already planned, at the same time as helping with encouraging healthy lifestyles and tourism. In the following submission, we have used NSC's own main headings.</p>	
Local Access Forum	Local Access Forum	<p>Throughout the area, there is a very fragmented network of public rights of way and, financially restricted as NSC is, the LAF is well aware that there is precious little money available to improve it. At the same time, NSC is charged with encouraging people to get more exercise. As stated above, the increased traffic following on from the new construction means that walkers, cyclists, horse riders and vulnerable road users – all indulging in healthy exercise – will be more and more at the mercy of traffic and this may result in many people no longer having the nerve to use what would once have been quiet roads for this purpose. It is important that NSC takes into consideration that horse riders make a significant contribution to the economy of North Somerset and keep hundreds of people employed in the more rural areas (vet, farrier, feed merchant, tack shops, livery yards, riding stables etc. etc). In addition, post Brexit, farm subsidy payments seem likely to be based around 'public good', so it makes sense to be sure that vulnerable road users are not deterred, even from using the existing network of rights of way, by the increased traffic.</p> <p>To promote healthy lifestyles and improve local access and rights of way, and comply with the Equality Act 2010, the LAF recommends that NSC makes provision of multi-user access a requirement in all new land development. Specifically, existing footpaths or other rights of way should be augmented to multi-user routes wherever practical. We define multi-user routes as follows:</p> <p>'A multi-user public right of way is one which permits the following groups of vulnerable non-motorised users to use it: walkers, cyclists and horse riders; the exception to non-motorised users is for the use of electric wheelchairs and mobility vehicles to ensure to those with more limited mobility are also included.'</p> <p>Although the term 'multi-user path' has never been defined legally, there is a legal right of way which would encompass all of these vulnerable user groups: bridleways. It is suggested by the LAF that when discussing any new multi-user paths proposed by the Council, or upgrades to existing rights of way, the above definition should be utilised unless there is a compelling reason why it should not, or that the status of bridleway is applied to ensure that all user groups are covered under law. This would both ensure that all vulnerable user groups are catered for and represents the best value for both the public and public money as it applies to the widest possible range of users.</p>	

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Local Access Forum	Local Access Forum	Needless to say, good public transport would do much to deter people from driving their cars. The reality, the LAF fears, will be otherwise. However, by adopting the suggestions made in this paper and improving the rights of way network, NSC can help alleviate this.	
Long Ashton Parish Council	Long Ashton Parish Council	<p>Overall North Somerset seem to have taken a pragmatic approach to meet the required housing numbers by spreading the majority of the housing over 4 areas.</p> <p>All of these proposal will increase traffic levels almost everywhere in NS and particularly around Long Ashton, as many of the new residents will travel to Bristol. There should be more emphasis on improving public transport in advance of the proposed developments.</p>	
Long Ashton Parish Council	Long Ashton Parish Council	<p>As a result of the planned residential developments, there will be a significant increase in traffic. Road safety and therefore traffic calming are an essential part of any long-term planning.</p> <p>The inevitable increase in traffic will have a significant impact on village roads and communities in many parts of NS. The consequences need to be considered to ensure the wellbeing of those potentially affected.</p> <p>Long Ashton is the closest village to a main highway access to Bristol, the increase in traffic will be felt particularly here, as drivers seek to avoid the congestion on the A370. The proposal to include a link to the A370 from the station at Backwell will increase traffic levels on this already congested road. The SBL has already resulted in an increase in traffic on this road and affected accessibility of Bristol from N Somerset.</p> <p>Pedestrians in Long Ashton are particularly affected as Long Ashton Road/Weston Road divides the village so that walking is hazardous through the heart of the village: to the shops, schools, playing areas, surgery and community centre.</p> <p>Long Ashton will require traffic calming for the whole length of the main road to reduce the average traffic speed in order to increase pedestrian safety. This is not because of any development within Long Ashton but because of developments elsewhere in NS that will bring more traffic into Bristol.</p> <p>Unless sufficient budget is included in the infrastructure requirements now being planned by NS, the cumulative effect of traffic distant from a development will not be addressed and NS will fail the needs of its residents here in Long Ashton with the consequent effects for commuters throughout NS.</p> <p>The proposed Park and Ride for Bristol south could also serve Bristol Airport by means of a shuttle bus.</p>	
Matt Griffith	Business West Chambers of Commerce and Initiative	<p>The West of England has set out to plan its future housing and employment land growth alongside its transport needs, through the parallel publication of the Joint Spatial Plan and Joint Transport Study (JTS). This is an entirely sensible approach – given how interlinked the two elements are.</p> <p>The current framework for spatial planning set out by the JSP for growth in housing, employment and urban living remain at risk of being unsustainable and creating serious problems of future congestion, accessibility and undermining the region's economic vitality.</p> <p>The latest 2018 version of the NPPF sets out some clear guidelines on the need to consider sustainable transport impacts during plan making. This includes:</p>	

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		<p>? Paragraph 102: “Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <p>a) the potential impacts of development on transport networks can be addressed;</p> <p>b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;</p> <p>c) opportunities to promote walking, cycling and public transport use are identified and pursued;</p> <p>d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains”</p> <p>? Paragraph 103: “The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”</p> <p>? Paragraph 108: “In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:</p> <p>a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;</p> <p>We do not feel the JSP and the North Somerset local plan have followed these guidelines when making their spatial choices for development.</p>	
Mead Realisations Ltd		<p>The JSP authorities have already acknowledged that there are congestion problems at Junction 21 (Weston-super-Mare) of the M5. In order to address this issue the JSP Key Diagram proposes a new motorway junction (Junction 21a) to the south of Junction 21, in the location where the A371 passes over the M5. The delivery of this new motorway junction is not only required to enable the delivery of additional growth at Weston-super-Mare, but the JSP states that it must also be in place before construction begins at the proposed Garden Villages at Banwell (1,900 dwellings) and Churchill (2,675 dwellings).</p> <p>2.70 We have significant concerns regarding the timescales for bringing forward the new motorway junction and the impact that it will have on delivering the Spatial Strategy. As set out at on page 71 of the Infrastructure Position Statement (October 2017) the motorway junction is scheduled to be delivered between 2020 and 2035. However, the cost is still to be confirmed and the funding sources are unknown. Given these issues it is considered unlikely that the new junction will be delivered until towards the end of the plan period at the earliest. This will clearly have implications for both the existing congestion issues at Weston-super-Mare and the delivery of the proposed Garden Villages.</p> <p>2.71 To resolve this issue the JSP should include an interim solution that will address existing congestion issues at Junction 21 and enable development to come forward ahead of the new motorway junction. In MR and WP’s view the solution should be the Junction 21 relief road that is already identified in the existing North Somerset Core Strategy, and for which land is safeguarded in the Parklands development for which outline planning permission was granted in 2015 (the Section 106 agreement also secures funding for improvements at or in proximity to Junction 21). This view is supported by Vectos who were appointed to prepare technical representations on the matter. The representations are included at Appendix 3, but the key points are summarised below:</p> <ul style="list-style-type: none"> • ? The proposed relief road will connect the A370 to the east of Junction 21 to the existing Wolverhill Road Bridge over the M5. • ? The JTS acknowledges that the cost of Junction 21a is still to be confirmed and the funding sources are unknown. • ? The Joint Transport Study (JTS) published in October 2017 acknowledges that there are congestion problems at Junction 21, and that the current levels of growth will mean that these problems will continue to worsen. 	<p>Appendix 3 - Technical Representations prepared by Vectos.pdf (693 KB)</p>

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		<ul style="list-style-type: none"> • ? In light of the risks identified within the JTS concerns are raised about how early in the plan period, or whether at all within the plan period, the new Junction can be delivered. • ? The deliverability of the relief road is significantly improved by the fact that a significant part of the required land is owned by Mead Realisations Ltd. ? • The relief road can complement the proposed Junction 21a. Also, as it can be brought forward in a significantly shorter time period than Junction 21a it would assist in delivering development during the interim period and allow the objectives of the JSP to be realised. 	
MLC		See attachment	9.docx (14 KB)
N Cooper	Claverham Future	<p>This whole plan is sadly wrong in the way it looks at transport. Ultimately the plan will have no impact on where people work or choose to spend leisure time. As I have mentioned many times in my comments... North Somerset new housing and existing stock that enters the market is generally beyond the means of people except those who have well paid jobs or have retired from the same, this is caused by the total lack of affordable housing. Accordingly, the majority of people commute to work outside of North Somerset and live here as a choice i.e. a Want and not a Need. Developing next to and remote from already overstretched rail services, over-filled roads and declaring that major new roads, junctions, and additional rail services/buses are the solution is irresponsible. If such plans are of any merit there must be evidence of costings, budgets to fund the costs and realistic delivery programmes. At present all is wishful thinking and North Somerset cannot believe for one moment that there is any trust that major infrastructure will be delivered until way too late if at all. To airily say funding will be by developer contribution and Govt Grants without any detail is irresponsible.</p> <p>The expansion in housing numbers North Somerset is being forced to provide a plan for are the result of highly questionable calculation and govt penalty (beat the wrong dead horse to see if it performs better). The only people who build are developers, Councils have lost the ability to deliver social low cost housing for rent so there never will be enough housing. If developers are to have so much power in these matters then only provide land in any plan where it makes sense... adjacent to key employment and existing infrastructure (Long Ashton and the south ring road). Stop bleating about urban sprawl, force new land allocation to be mid-rise high density (not a measly 40 per hectare) and critically study Bristol's inability to find developable land in its area.</p> <p>This plan is defeatist and delivers almost exactly the worst option for its major housing schemes with fantastic new infrastructure requirements.</p>	
Nailsea Town Council	Nailsea Town Council	<p>Most of the residential development outside Weston super Mare will inevitably increase commuting between residential and employment centres, mitigated by possible growth in working from home. Development to the south west of Nailsea and west of Backwell will not significantly increase local employment. Access to main employment centres will substantially increase pressures on the Cumberland Basin (for access to Bristol) and the routes to the M5, particularly from Nailsea to junction 19 (for access to employment locations north and east of the Avon).</p> <p>As well as the need to access the B3128 more easily from Nailsea there will be increased pressure on Portbury Lane, which together with Wraxall Hill needs improved traffic management in advance of any major housing development.</p>	

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		<p>The notion of a bus and train hub at Nailsea and Backwell Railway station is supported. This would effectively create a ‘park and ride’ facility for travel to Bristol and beyond. The essential development of the station in terms of platform length and accessibility must be coupled with the additional provision of parking space to optimise the potential of the hub.</p>	
Natural England	Natural England	<p>Many of the transport proposals to support new development in North Somerset have significant and long term implications for the natural environment, including through land take and barrier effects.</p> <p>Route alignment and others options, particularly in relation to the SDLs, will need to be underpinned by a sound understanding of the use of the area by horseshoe bats, hydrology in relation to the SSSI ditch systems and the special qualities of the Mendip Hills AONB, to ensure adverse effects on these interests can be avoided.</p>	
Network Rail (L Bullock)	Network Rail	<p>Network Rail supports the ethos of the plan with regard to the provision of increased densities of housing near to rail stations, opportunities for improved transport facilities, including the re-opening of Portishead rail connection and the improvements of links to and from the railway.</p> <p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. With this in mind I would strongly urge that when the council undertakes its viability testing for any proposed allocated sites it considers the impact the proposal may have on the railway infrastructure. The cost of mitigating any impact may have a bearing on the viability and deliverability of any such proposed site.</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the country’s railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail’s infrastructure.</p> <p>Level Crossings</p> <p>There are several level crossings in the plan area, any development of land which would result in a material increase or significant change in the character of traffic using a rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.</p> <p>Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned by the impact the proposed site allocation would have on the safety and operation of these level crossings. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.</p> <p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> • By a proposal being directly next to a level crossing • By the cumulative effect of development added over time • By the type of crossing involved 	

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		<ul style="list-style-type: none"> • By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing • By developments that might impede pedestrians ability to hear approaching trains • By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs • By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing. <p>It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the three level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.</p> <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-</p> <p><i>(Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010) to requires that ... where a proposed development is likely to result in a material increase in the volume or a material change in</i></p> <p><i>the character of traffic using a level crossing over the railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for</i></p> <p><i>separate approval".</i></p> <p>We would appreciate the Council's providing Network Rail with an opportunity to comment on any future planning policy documents as we may have more specific comments to make (further to those above). We look forward to continuing to work with you to maintain consistency between local and rail network planning strategy.</p>	
Newland Homes		<p>7.1.1 The JSP authorities have already acknowledged that there are congestion problems at Junction 21 (Weston-super-Mare) of the M5. In order to address this issue the JSP Key Diagram proposes a new motorway junction (Junction 21a) to the south of Junction 21, in the location where the A371 passes over the M5. The delivery of this new motorway junction is not only required to enable the delivery of additional growth at Weston-super-Mare, but the JSP states that it must also be in place before construction begins at the proposed Garden Villages at Banwell (1,900 dwellings) and Churchill (2,675 dwellings).</p> <p>7.1.2 Newland Homes do not object to the principle of Junction 21a but do have significant concerns regarding the timescales for bringing forward the new motorway junction and the impact that it will have on delivering the Spatial Strategy. As set out at on page 71 of the Infrastructure Position Statement (October 2017) the motorway junction is scheduled to be delivered between 2020 and 2035. However, the cost is still to be confirmed and the funding sources are unknown. Given these issues it is considered unlikely that the new junction will be delivered until towards the end of the plan period at the earliest. This will clearly have implications for both the existing congestion issues at Weston-super-Mare and the delivery of the proposed Garden Villages.</p>	
P Chedgy		<p>The proposed new roads are very likely substantially to increase the volume of traffic in the area and particularly in both directions on the A38 that already has become increasingly busy and delay-prone because of the expansion of the airport and the installation of traffic lights in its vicinity.</p>	

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P Heaton-Armstrong		<p>My comments relate to the Transport aspects - this is Part 5 - The Reinstatement of the Portishead Rail Link</p> <p>The history of the rail link to Portishead goes back over many decades and the promise of its reinstatement has been a significant factor in furthering the residential development of Portishead in recent years ... it's a vexed issue for the people of Portishead. The promise of the rail link has helped many developers and estate agents sell houses in the town. But still it is not clear it'll go ahead even though the DCO is in the process of being drawn up ... then there is the matter of funding ... some £47m according to the latest estimates which the Government indicate they are not going to fund ... and now there is a requirement for an IROPI assessment (as part of the Habitats Regulation Assessment) which will delay it even further.</p> <p>What seems to be missing in this debate is the fact that this rail link has a strategic importance, in that in addition to it being redeveloped as a passenger commuter link, it serves the commercially important Portbury Docks where there is an annual turnover of 800,000 vehicles per year.</p> <p>As I understand it The Bristol Port Company has a contract with Network Rail for 24 "slots" for train movements per day on the Portbury/Portishead branch and that as the Company made a considerable financial contribution towards the cost of the original reinstatement then in all probability the Company would wish to continue to maintain that facility into the foreseeable future.</p> <p>Apparently the whole of the 24 slots per day are being used by car movement trains, mainly imported cars going to northern England and Scotland ... with empties returning. These movements are mainly taking place at night when the demands on the Bristol to Exeter line through Templemeads are under less demand ... it seems that during daytime hours Templemeads is a bottleneck with passenger services. To do this several car trains are being lined up one behind another and despatched throughout the night.</p> <p>It's interesting to note that whilst there have only been 4 bulk ship loads of high value calorific coal imported this year for use at Aberthaw Power Station it had all been moved from Portbury Dock by conveyor system under the River Avon to the rail hopper near St Andrews Road Station for onwards transportation to Wales thus avoiding the constriction of rail traffic movements through Bristol Templemeads.</p> <p>At the Portishead Town Council "Planning and Regulatory Committee" Meeting on 21st November (which was open to the Public) Transport matters were discussed as part of the feedback to NSC on the "Issues and Options Local Plan 2036".</p> <p>In the context of road transport matters and the current peak time traffic overload problems at Junction 19 on the M5 Motorway, and the burgeoning development at Severnside which will inevitably draw many of its workers from Portishead, it was suggested that a new road bridge over the River Avon be reconsidered ... it would of course have to be some form of swing bridge ... this is not a new idea and has been considered several times in recent decades. If this were to be promoted as an option to be considered for inclusion in the Local Plan then perhaps it might be both a combined road and rail bridge. Perhaps it could be built for considerably less than the price tag associated with upgrading the existing rail link to provide a commuter passenger service.</p> <p>The "Issues and Options" document does not refer to these matters in any substantial way ... yet for the people of Portishead (and beyond) these are significant factors in the communication links of the future.</p> <p>PHA - 8th December 2018</p> <p>Footnote - I am a resident of Portishead and regularly attend meetings of Portishead Town Council ... as a member of the public audience. I'm a retired Civil Engineer ... with many years experience in dealing with planning and strategic issues. As a young engineer I worked on the construction of the M4 motorway near Pucklechurch.</p>	

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P Heaton-Armstrong		<p>Whilst there are proposals for creating some new road links between the new development areas and the existing road systems it seems to me that the inter regional transport aspects have not been properly considered. It appears that there is a disconnect in these proposals between the local transport considerations and the national strategic considerations. These proposals do little to address the integration of these two aspects.</p> <p>Highways England (South West) recently stated that traffic volumes are growing at a rate of 2% per annum and it is my belief that the roads in North Somerset are not “geared up” to handle this volume of traffic, which at peak times, are already not coping with the volumes. The Bristol City metropolis with all its employment and habitation demands continues to grow apace but the neighbouring North Somerset is still a “County” and is just not geared up to match this demand in its roads systems, it does not have the Expressways and “A” Class roads system to match this growth and deliver its workers to their place of work. It seems to me that there are both national strategic issues and local issues to be considered.</p> <p>Strategically, the M5 Motorway is the only national link between the Midlands and the South West peninsula and as we know all too well it regularly reaches saturation point in the summer holiday months with extensive tailbacks in both south and north directions in North Somerset. If there is an accident blocking the motorway the traffic diverts along local “A” and “B” Class roads clogging a series of towns and villages in the County as there are no feasible alternative motorway or expressway routes. The geography of the county with its ranges of hills and the boundary formed by the Bristol Channel means there is little opportunity to consider alternative routes, the only option appears to be to enlarge the existing road systems and build new link roads and bypasses. Solutions to these aspects need to be jointly considered by Highways England and the Councils in the South West ... North Somerset needs to resolve these issues with its neighbouring Councils and Highways England.</p> <p>The Plan envisages extensive house building in the County in the years ahead but it appears to me that the Transport system, both road and rail, is already not capable of dealing with the resultant mobility needs of the existing residents let alone the new ones. The “A” Class road system on which we all depend is mainly single carriageway, very little of it is dual carriageway. Currently there does not appear to be a published integrated road and rail plan ... though I understand MetroWest is working on it at the moment.</p> <p>Highways England has recently acknowledged a series of issues which are of concern, in particular traffic queuing on motorway slip roads and, as many of you will no doubt be aware, my concern is with those who regularly wait in a lengthy queue at peak times to exit southbound at Junction 19 for Portishead, Nailsea and south Bristol ... and the risk they are exposed to as a consequence. Such issues urgently need to be addressed.</p> <p>These are significant issues for North Somerset Council to consider when finalising the outcome of the “Issues and Options Local Plan 2036”.</p>	
P Heaton-Armstrong		<p>New M49 Severnside Motorway Roundabout ... Traffic Issues</p> <p>This new motorway roundabout is under construction on the north side of the River Avon on the M49 ... at a cost of £24m. I have plagiarised much of the commentary below from Bristol newspapers and journal sources. It is being built to provide motorway access for the new Severnside Industrial area, I understand the huge new Amazon warehouse alone is going to create 5,000 jobs ... and that’s only a small part of the development. I’m thinking many of those employees will travel by car/van using over the Avonmouth motorway bridge via the M5 Junction 19 (the Portishead junction) as a point of access to their place of work ... and subsequently for distribution of their goods southwards. There are some huge questions here for a Highways England to answer as to how our local motorway system is going to operate particularly when the M5 is full with holiday makers travelling down to Devon and Cornwall. The new Severnside Industrial area lies outside the area of this Issues and Options document but, because of its proximity to Portishead, it will have a significant effect on the local transport links ... this is not covered within the document.</p> <p><i>New M49 Severnside junction to open up 300 acres of employment land at a cost of £24m</i></p>	

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		<p><i>Highways England has announced preparation work for the construction of a new M49 junction, which will open up 300 acres of employment land in Avonmouth, will begin this week.</i></p> <p><i>The junction will enable access to a 296-acre site owned by real-estate developers Robert Hitchins and Harrow Estates.</i></p> <p><i>The land will provide more than four million sq ft of employment space, the development of which will create thousands of new jobs.</i></p> <p><i>Robert Hitchins and Harrow Estates have already secured planning permission for offices, R&D buildings, storage and distribution centres, and industrial warehouses to be built on the Westgate site.</i></p> <p><i>Simon Tohill, property and development director of Robert Hitchins, said: "It is a very welcome investment by Highways England, which will open up Severnside and Avonmouth to significant economic activity.</i></p> <p><i>"We have been working alongside Highways England to provide the land necessary to enable the junction to go ahead and we look forward to delivering future employment opportunities.</i></p> <p><i>Mr Tohill says Westgate is "strategically located" next to the M49, which links Bristol and the South West to Wales, and provides access to the M5 and M4.</i></p> <p><i>The site is also close to Bristol Airport and the expanding Avonmouth and Portbury Docks</i></p> <p><i>"It will change the profile of Westgate dramatically and unlock a large and incredibly well-located site, which already benefits from planning permission for employment uses."</i></p> <p><i>A spokesperson for Highways England added: "We recognise the strategic importance of the Avonmouth and Severnside Enterprise Area as a key regional employment site and this new junction will help unlock economic growth in the area."</i></p> <p><i>Construction company Galliford Try will be carrying out the building work on the junction, which will start in earnest in summer 2018.</i></p>	
P Heaton-Armstrong		<p>Junction 19 on M5 Motorway</p> <p>The Strategic Importance of the Portishead Roundabout</p> <p>This junction was designed in the early 1960's and constructed in the late 1960's. It was built to manage traffic flows in the years immediately following and has been upgraded only once in the 60 years since that time and that was recently when some road widening took place, the lane designation was changed and computer controlled traffic lights were introduced to speed the gyration of traffic. A sum of £2.8m has been allocated by Highways England for further improvements which were due to start in 2018 ... but seem to have stalled!</p> <p>In recent years it's strategic importance has evolved and changed but little has been done to significantly improve its ability to cope with peak time traffic flows. The most hazardous of this regularly occurring situation is the long tailback of south bound traffic on the M5, which can obstruct merging traffic from both the M49 and the A403 Avonmouth Docks link road. This slow merging traffic, which has to cross through the often standing traffic on the inside lane (designated for the A369 and Portishead traffic) can, particularly during summer holiday months, cause the tailback to reach J17 on the M5.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>This hazardous situation results in considerable driver frustration with a high risk of vehicle collisions to express it another way it becomes “a right carve up”. One particular high risk manoeuvre concerns Portishead destined drivers who are not able to join the tail end of the slip road queue (because it goes so far back) cutting in at the last moment whilst large articulated lorries having crested the Avon Bridge on the inside lane put on speed to gather momentum in anticipation of climbing the south bound carriageway up what is known as Naish Hill suddenly they are confronted by near stationary traffic on a section of motorway which is heavily trafficked. Two years ago there an articulated lorry jack-knifed and went backwards through the boundary fencing luckily this was not at peak traffic hours! Time and again heavy lorries, in particular car transporters, cut in at the last moment (even over the white zigzag road markings) causing high degrees of anxiety and consternation about drivers safety. In my opinion this situation is a disaster waiting to happen the risks are unacceptable high.</p> <p>This roundabout has a national strategic and important economical multifunctional role, it serves:-</p> <ol style="list-style-type: none"> 1. The Portbury Dock was constructed in the period 1972 to 1977 and has continued to expand every year since it was opened in 1978. What is now the industrial estate (home to Gist Food Supply Chain, Kerrygold Foods Group, Brakes Food Drinks and Catering Products, Lafarge Plasterboard) was still an extensive area of rough ground at that time and the pounds for storing imported cars were only just beginning. In the subsequent 60 years since the roundabout was constructed there has been considerable increase in traffic flows to the Docks. The car pounds, required for the short term storage of 800,000 import and export vehicles annually, have continued to expand year by year and so too have the number of articulated car transporter lorries bringing cars to the Docks and taking away vehicles to national locations. 2. The Gordano Service Station (opened in 1973) attracts a continuous flow of travellers, its the only one on this section of motorway. But because it serves both north and south bound traffic all these vehicles have to fully navigate the roundabout thereby adding an extra traffic load to an already overloaded situation. It’s particularly heavily used during the summer holiday months. 3. The town of Portishead has expanded rapidly since the mid 1980’s. Its residential population has tripled in the last 30 years and with it the number of commuters using The Portbury Hundred as their access to the motorway system has grown rapidly year by year. Other than buses there is no other means of public transport ... currently there’s no operational rail link. 4. The town of Nailsea has expanded hugely in recent years with extensive residential building ... commuters going north gain access to the motorway system using this junction, its their nearest point of access for north bound travellers, and similarly when they return home. The Plan indicates that Nailsea will be designated for 2,750 houses in the years ahead and its inevitable that traffic volumes will increase even more with the construction of these new properties. Add to this the additional traffic arriving via the new South Bristol link road for those workers making their way to the new Severnside Industrial area and this will exacerbate the situation at an already overloaded junction. 5. The A369 is a designated route for travellers making their way to Bristol Airport from the north, and similarly when they return home. Bristol Airport has seen huge expansion in recent years with passenger throughput going up in leaps and bounds ... and further expansion is proposed ... up from 10m passengers per year to 20m per year. <p>With all these demands it’s not surprising that time and again this roundabout gets clogged with traffic, often with several multiple axle articulated lorries going down to the Docks which are waiting at the traffic lights ... but because the roundabout is so small the tailback comes back over the motorway bridge and obstructs the flow of traffic into Portishead so exacerbating an already difficult situation.</p> <p>The net result is that the roundabout doesn’t have sufficient capacity to absorb and gyrate this volume of traffic ... it just isn’t big enough! If, for instance, it’s compared to say Junction 20 on the M62 near Rochdale ... it’s about half the size.</p> <p>In my opinion what’s needed is a considerably bigger roundabout (perhaps with a new bridge over the motorway closer towards the village of Portbury) ... and an increase in the width of the Portbury Hundred (A369) to accommodate peak time traffic. Whilst traffic can exit the roundabout onto the Portbury Hundred it chokes within 100 metres ... often coming to a standstill.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>There needs to be an overall reassessment of this strategically and economically important Junction. Whilst some improvements have taken place I believe they have not gone far enough to resolve these longstanding issues and I doubt if they'll measure up to anticipated traffic growth rates generated by the new housing envisaged in the Local Plan 2036. North Somerset Council needs to resolve these matters with Highways England ... sooner rather than later!</p>	
Parish Councils Airport Association	Parish Councils Airport Association	<p>There is a major issue of airport offsite car parking. The PCAA call for a Supplementary Planning Document on offsite car parking which supports local communities and protects the greenbelt.</p>	
Parish Councils Airport Association	Parish Councils Airport Association	<p>The PCAA cannot give an informed comment as detailed transport reports have not been published with this Plan. Likewise the Joint Local Transport Plan which should be run in parallel with this Plan has not been published. The Bristol South West Economic Link Study which is directly relevant to this Plan has not been made available. This indicates that this issues and options document is premature.</p> <p>A full and comprehensive understanding of the transport and land use implications is required in order to understand the impacts on residents' quality of life and the local and global environment and if they can be mitigated.</p> <p>This Plan indicates that car emissions from airport and housing development will increase rather than decrease which suggests some change must be made within the Plan.</p> <p>The additional Transport Topic Paper 8 November 2018 fails to take account cumulative impacts of vehicles to and from Bristol Airport with the new Strategic Development Locations. The RASCO study for the BA Master Plan 2006- 2030 showed that airport traffic at 12 mppa 'would account for 40% of traffic on the A38 which would suffer from major levels of congestion so constraining access to the airport. All other key links would experience congestion to varying degrees due to high levels of background traffic, including immediate levels on the A370 and M5.' Note that the RASCO study did not take account of the SDLs. The cumulative impacts of growth at Bristol Airport particularly on road traffic must be taken into consideration with SDLs.</p> <p>Transport Topic Paper 8 should take account of the imminent increase in vehicle emissions to be created now and the future growth of Bristol airport in the plan period as road traffic is one of the most important sources of carbon dioxide (CO2) emissions, which are contributing to climate change. It should also take in the cumulative impacts of road traffic to and from Bristol Airport with the new Strategic Development Locations.</p> <p>Transport produces 29% of total carbon emissions in the West of England. Although there has been a decrease of 8% emissions in the region between 2005 and 2014 it would be helpful to know what the total carbon emissions figure is for 2017. This would show if the region is still making progress which the PCAA question. The PCAA note that all reports within the JSP on emissions state that the proposed JSP will make it exceedingly difficult to reduce the overall carbon footprint of transport in the area.</p> <p>The Climate Change Act is a legally binding commitment by the UK government to achieve an 80% reduction in carbon dioxide (CO2) emissions by 2050 from a 1990 baseline. Local authorities in the West of England have adopted targets that are in line with or more ambitious than the national targets in the Climate Change Act. Taken in total, these targets require carbon emissions in the West of England to be reduced by 50% by 2035 and by 83% by 2050 on a 2014 baseline. The PCAA can not see how Bristol Airport growth plans fit within this scenario as there will little increase in public transport to Bristol Airport under option 2.</p> <p>The North Somerset Climate Local Commitment Update Report 2018 reflects the West of England adopted targets but fails to mention how Bristol Airport will reduce car travel and thus emissions.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The PCAA objects to a Park and Ride scheme in the greenbelt for 550 car parking spaces. The construction of a site in the greenbelt will undermine further the 'openness of the greenbelt' and will bring more noise and light to the area. The PCAA objects to the use of the Park and Ride being used for airport car parking. Little is said in the additional West of England technical papers and no diagram was given of the location suggested.</p>	
Pegasus (D Millward)	Pegasus Group	<p>Transport Infrastructure</p> <p>We are also concerned by the significant reliance upon a series of Strategic Development Locations (particularly Banwell and Churchill) given the overall cost of delivering the associated transport programme. The Transport Topic Paper 8 (WED007) indicates that the total cost to deliver the transport works for the SDLs is estimated to be between £1-1.4 billion and this would be <i>"an ambitious programme and would represent a step-change in the level of investment from that achieved in the last two decades"</i>. For the Banwell and Churchill components this is estimated as being between £180-185million.</p> <p>As the Topic paper makes clear, <i>"in most cases, it is anticipated that the transport schemes will be completed either in advance of, or during, the early phases of housing build-outs in the relevant SDLs"</i>. Such a conclusion is not surprising given the standard of existing infrastructure and its ability to accommodate major strategic growth.</p> <p>Whilst, we do not object to the Councils pursuing ambitious programmes of work, we remain sceptical that all works will receive funding and it is understood none benefit from committed funding at present.</p> <p>Even <i>if</i> all the proposed projects receive funding, the associated timescales are likely to be significantly longer than anticipated. Therefore, their implementation and build out rates will be significantly longer than currently envisaged. This in turn would result in the delivery of residential units over a much longer timetable than currently anticipated. In North Somerset the Council are expecting to deliver all but 125 of the proposed dwellings at their SDLs by 2036.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>The principal transport schemes are illustrated on Plans A and B which are more detailed diagrams than those shown in the JSP Transport Study. How these schemes are progressed is entirely dependent on the outcome of the JSP examination.</p> <p>We have a number of comments on the specific schemes set out in Plans A and B particularly in relation to their phasing as following:</p> <ul style="list-style-type: none"> • E3 in the first phase includes a railway bridge over the main railway line. The first phase also includes E6 which itself includes a second railway bridge. Delivery of railway bridges over mainlines is a complex and time consuming issue and will inevitably delay delivery of these packages in the first phase. • Proposals to improve links to junction 20 in W4 and W5 are in separate phases but should be considered together if they are to have any effect. • However given that W4 and W5 do rely on the existing B3130 through Tickenham this will limit their effectiveness. • N1 and N2 to improve Portbury Lane and links to junction 19 are in separate phases and should be undertaken together if the improvements to Portbury Lane are to be effective. • Equally if these schemes are to improve links between Nailsea and Backwell and junction 19, additional works will be necessary to junctions on Wraxall Hill and Portbury Lane with the B3128. • Taken together E3 and E6 are linked by an unimproved section of A370 through Flax Bourton. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> The link between junction 20 and the strategic development location at Nailsea is shown as a '<i>long-term potential link</i>' rather than a necessary scheme under the package of improvements which will be necessary to avoid problems on the B3130 through Tickenham. <p>In the case of the Backwell and Churchill SDL's and proposed highway improvements, the issue of how effective they will be in the absence of a new junction 21A need urgent consideration. We note there is no phasing identified for these proposals, but if they are to both provide congestion relief to junction 21 and accommodate the traffic arising from the Banwell and Churchill SDL's they will need to be delivered with the new junction and early in the plan period to enable delivery of the necessary housing at these locations.</p>	
Portishead Town Council	Portishead Town Council	<p>The need for new thinking about Portishead's transport links particularly its possible connection to the main growth employment development area within the sub-region.</p> <p>Portishead has transport issues which are not being addressed within this document. Welcome and support the work being done to open the railway link but it will not resolve these issues, and therefore other options should be explored to enable access to and from Portishead. Options include easing traffic at M5 junction 19 by creating a northbound service station between junctions 20 and 19 and finding another method of crossing the Avon.</p> <p>All new cycle path proposals should be designed for multi-use by people and horses.</p>	
R Smith	Walsingham Planning	<p>Overall, LVA consider that the Consultation Document does not reflect the significant risk that the transport infrastructure required to deliver the SDL's is not viable. By contrast development North of Nailsea does not rely on significant transport interventions and will reduce traffic flows on local junctions.</p> <p>As previously noted a Draft Transport Review of the Strategic Development Locations has been prepared by Trace Design. It provides a detailed review of development areas around Nailsea including land North of Nailsea and the two proposed SDL's in Nailsea and Backwell. It assesses the accessibility of the sites to facilities in the town, the suitability of the surrounding highway network and the traffic impacts in terms of changes in traffic flow.</p> <p>Since undertaking this review the West of England authorities have published new evidence for the JSP that includes further transport studies. These studies were published after the publication of the Consultation Document, although it does make reference to them. This serves to highlight the lack of clarity regarding the evidence base supporting the Consultation Document, which makes it difficult to provide feedback. LVA intend to comment on these documents as part of the separate consultation process and Trace are currently finalising their Review in light of the latest JSP evidence.</p> <p>Notwithstanding the above the appraisal by Trace finds that to conform to Policy 5 of the JSP the SDLs in Nailsea and Backwell will require substantial highway and public transport infrastructure costing in excess of £300m. There is no guarantee that this funding will be approved by Government and therefore a significant risk exists that the proposed SDLs will not be viable.</p> <p>The sites in Nailsea and Backwell are clearly not well located and are not supported by the necessary infrastructure. The scale of new infrastructure suggested in the JSP amounts to at least £82,000 per dwelling and with uncertain Government funding suggests that the sites may never be developed for the planned levels.</p>	

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		<p>The most obvious mitigation of the northern site is the provision of a Northern bypass as part of the development, which would remove through traffic travelling between Clevedon and the A370 along the B3130. Consideration would also be given to off-site mitigation with possible improvements to mini-roundabouts at the junctions of B3130 with the B3128 and the junction of the B3130 with Wraxall Hill.</p> <p>To show the benefits of the northern area in terms of its good accessibility the site has been compared to the South West SDL in Nailsea. The clear conclusion from the appraisal is that the northern site is much closer to primary facilities (excluding leisure uses) than the proposed Nailsea SDL.</p> <p>In all cases it is clear that the development of land to the North of Nailsea warrants serious consideration. It has the greatest accessibility to the town centre and other facilities in the town, is located adjacent to the B3130, can provide a much needed Northern bypass removing through traffic and can provide off-site mitigation at the B3128 and Wraxall Hill junctions. It is also not dependent on the early construction of the A370 to M5 Junction 20 Link Road.</p>	
R Wood		<p>The M5 is an accident black spot - there is a crash between Avonmouth and Weston several times a week making commuting a nightmare.</p> <p>as result local roads are always crammed with traffic jams that they cannot cope with. This situation needs to be addressed before building new homes which will inevitably make the situation worse in the Future.</p> <p>Reality is that Public transport does not serve the rural areas and commuting from West End is a non starter</p> <p>Until Both infrastructure and Public Transportation become a real option the situation will only get worse.</p> <p>The council are paying lip service and not living in the real world. What should be a 20 minute commute from West end to Avonmouth regularly takes more than an hour or two because of the M5 car park and congested side roads.</p>	
RS Hill and Sons Ltd		<p>Representations to the Draft North Somerset Local Plan 2036 – Issues and Options on behalf of RS Hill & Sons, owners of Hillview Park Home Estate, Lulsgate, Bristol BS40 9XE</p> <p>On behalf of our client RS Hill & Sons Ltd, RPS has prepared the following representations to the ‘Local Plan 2036 Issues and Options (hereafter referred to as ‘NSLP’). RS Hill & Sons Ltd owns the residential Hillview Park Estate park home site located on the A38 Bridgwater Road, Lulsgate, Bristol and comprises of 24 owner-occupied park homes which are aimed at adults over 50 years. They have recently become aware of the potential for significant road improvements that are proposed along the A38 Corridor, which in the absence of any other information to the contrary, could have the potential to significantly and detrimentally adversely affect the Park if these take place along the road’s existing alignment.</p> <p>Their specific concerns are as follows:</p> <ul style="list-style-type: none"> • The existing A38 Corridor in the area is narrow and immediately abuts the existing Park Estate and other businesses and residents on both sides of the road. It is difficult to see how any enhancements (e.g. additional carriageways) can be facilitated within the existing highway boundaries, and this may only be achieved by increasing land take through land acquisitions or compulsory purchase. For the 	<p>RPS on behalf of RS Hilland Sons Ltd.pdf (5.0 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Hillview Park Estate, the only car park for residents sits immediately adjacent to the A38 highway boundary and any widening project which removes this car park could adversely affect the parking situation at the Park as there are no other parking facilities available or land on which a new car park could be provided. Our client must therefore oppose any road improvement proposals which would require additional land along the current A38 alignment.</p> <ul style="list-style-type: none"> Our client also has concerns that other strategic development will result in increased traffic along the A38 which may make it more difficult to access the Park via its existing access/egress onto the A38. The following comments are provided specifically on the Local Plan 2036 - Issues and Options within this context. We understand that there are no consultation forms as part of this consultation. It should be noted that RPS has also submitted representations to the West of England Joint Spatial Strategy Publication Document November 2017 (JSP), and to the Draft North Somerset Local Plan 2036 – Generating Ideas (NSLP – GI), both of which referred to the concerns noted above. <p>Representations</p> <p>It is our understanding that North Somerset Council have begun preparation of a new local plan to allocate development sites, infrastructure, green spaces, etc and set out in more detail on how development will be managed up to 2036.</p> <p>At this stage there is no draft plan, and there are no detailed policies or site allocations which may be considered. Such policies will be consulted upon at a later date, taking into account the results of this consultation. As such, it is important that early representations are made with which the Council can formulate long term strategies. The Issues and Options report recognises increased road connection between the Airport and South Bristol may be a method of delivering transport objectives. Question 39 asks “are there any other transport issues or challenges that have been missed? How can they be addressed in the Local Plan?”.</p> <p>The Local Plan does not recognise the impact on existing properties along the A38 Corridor from Bristol Airport to the South Bristol Link Road. RPS would like to reiterate its comment on this matter with respect to the potential improvements to the A38 Corridor from Bristol Airport to South Bristol Link Road. RPS requests that the Council, incorporating any improvements to the A38, set out that it will seek to realign the A38 through fields to the east of the existing A38 (the offline route), and not seek to widen the existing A38 itself (the online route), as this may not be possible without impacting on existing properties given the limited land available to facilitate any widening improvements.</p> <p>We reiterate both the Joint Local Transport Study prepared for the JSP, and the Bristol Local Enterprise Partnership have drawn up an option for the new alignment, and we enclose this with these representations for due consideration by the Council as they prepare the Local Plan. We have also requested the Key Diagram and relevant policies of the NSLP (along with the JSP) make clear reference to the proposal to provide for a new road alignment for any improvements to the A38 (offline route), and that any alignment should be directed to a location to the east as far away as possible from the existing park home, residential and businesses located along the A38 to minimise harm to existing properties. To exclude references to the main locations and routes for such key infrastructure would in our view render any future Local Plan ‘unsound’ as it would fail to comply with National Planning Policy Framework Paragraphs 20b), 22 and 104c) and e).</p> <p>Please do not hesitate to contact us regarding any of our representations above. We look forward to working with the Council on the preparation of the draft North Somerset Local Plan in due course.</p>	
ruthpenhallow		<p>The transport infrastructure we have currently cannot cope with the number of people who currently live and work in the area, any improvements as part of the local plan must be above and beyond what is already needed. The M5 is gridlock. The bus service needs improvement and needs more information available. Whenever there is a large event in town/on the sea front, the roads are crammed trying to get out of town, all local residents use their cars as public transport isn't an option and there is never any thoughts of putting on park and ride schemes! Why try and pull more tourism in when there is no where for them to park and no alternative route into town? Walking is simply not an option for most! Especially as most growing housing areas are not walkable to town.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
S Moore		No amount of tourist cycle routes will solve the fundamental issues with building significant numbers of new housing in open countryside, with no public transport infrastructure to support them. The proposed Garden Village at Churchill is the worst example of this.	
South Bristol Business (M. Knight)	South Bristol Business	<p>We support significant investment in transport provision, however, we are puzzled as business, why investment in roads, so vitally important, sits at the bottom of the transport hierarchy!</p> <p>We support the work and findings to date of the Bristol South West Economic Link Transport Study.</p> <p>We also support further development of the Metro network and a further Park and Ride for the A38.</p> <p>Bristol Airport.</p> <p>We recognise and support, the importance, special economic and employment significance of Bristol Airport both locally within the North Somerset/ South Bristol economic conurbation and regionally across the South West and support its expansion plans. We feel further employment, business expansion plans may well be possible on the site to mutual benefit of Bristol Airport and North Somerset Council and the South Bristol area.</p> <p>Bristol Port.</p> <p>Similarly, we recognise and support the substantial place Bristol Port occupies in the West of England economy and its future plans.</p>	
Stowey Sutton Parish Council		<p>Stowey Sutton Parish Council cannot give an informed comment as detailed transport reports have not been published with this Plan. Likewise the Joint Local Transport Plan which should be run in parallel with this Plan has not been published. The Bristol South West Economic Link Study which is directly relevant to this Plan has not been made available. This indicates that this issues and options document is premature.</p> <p>A full and comprehensive understanding of the transport and land use implications is required in order to understand the impacts on residents' quality of life and the local and global environment and if they can be mitigated.</p> <p>This Plan indicates that car emissions from airport and housing development will increase rather than decrease which suggests some change must be made within the Plan.</p>	
Taylor Wimpey - The Vale		<p>1.32. Notwithstanding the comments made elsewhere within this document, the starting point within the emerging JSP and the Local Plan should be to make the most of existing and committed transport infrastructure and public transport, as opposed to proposing SDLs and other allocations which are entirely dependent on as yet unsecured (public) funding to enable delivery of development.</p> <p>1.33. The Vale, as an alternative location for development, requires no infrastructure investment from the public purse and is able to deliver development in a highly sustainable location, with demonstrable market demand for residential, where there has already been significant public investment in road and bus infrastructure (South Bristol Link Road and MetroBus). Furthermore it could provide easy walking and cycling connections into Bristol on segregated routes, can provide land to facilitate a train station and new and extended park and rides, as well as safeguarding land for potential future surface access routes to Bristol Airport. No other location of the same scale in North Somerset has these benefits.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
The Belmont Estate	Ridge and Partner LLP	<p>The Estate is concerned regarding the latest JSP Transport Topic Paper (8) and the modelling that has been undertaken which does not appear to have not been validated using current traffic flows on the SBL and at the A370 roundabout.</p> <p>The Estate is also concerned regarding the lack of consideration regarding the Cumberland basin which already experiences significant traffic congestion issues. We would suggest the following potential solutions for the Local Plan:</p> <ul style="list-style-type: none"> ? Allow Bristol to expand by reviewing adjacent greenbelt land such as the Vale which already has excellent proximity enabling environmentally positive solutions and making public transport more viable and cost effective. ? Consider policies that look to increase building up, rather than out, wherever possible. ? Ensure that excellent local rail transport including the Portishead rail link are implemented in advance of any new residential development. 	
Tickenham resident	Mrs	<p>I've lived in Tickenham since 1985 and there has always been enough traffic through the village to make life difficult. This has got steadily worse. Over the years I've noticed planning applications running into difficulties because of concerns about extra vehicles exiting onto Clevedon Road, and yet now you propose to allow a substantial increase in the amount of traffic coming through Tickenham. Tinkering with the two ends of Clevedon Road will only funnel the extra traffic through the main part of the village, where the 30 mph limit will still be in force. The village will become a bottleneck, polluted with even more traffic fumes and making it nearly impossible for residents to drive out of their properties. Pedestrians will have an even worse experience. The money that you're planning to spend on messing around with the Clevedon and Nailsea ends of the road would be far better being put towards providing Nailsea with a proper access road for the motorway. As usual Tickenham is being ignored.</p>	
Tom Leimdorfer		<p>Much of current planning and decision making is from the viewpoint of current patterns of intensive individual private car use. It is good to see here the emphasis on new technologies, improved public transport, behaviour change and the imperative to reduce carbon emissions from road transport.</p>	
Vence LLP		<p>We note that the Transport Chapter of the Issues and Options document puts an emphasis on encouraging public transport use and the need to provide realistic and attractive alternatives to the private car (page 82 bullet point 2). Vence LLP would support the principle of this objective and would add, therefore, the need to ensure that the plan provides opportunity to areas already in immediate proximity to public transport infrastructure to be developed and be open to allowing opportunities for sustainable growth. This is relevant to the land north of Metrobus and ensuring that other policies in the plan allow this site to be sufficiently unlocked to deliver development that would benefit from immediate access to Long Ashton Park and Ride. Further, within this chapter, we note on page 83 the plan identifies that there may be a need to safeguard</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		land for future rail redevelopment opportunities. Vence LLP, whilst recognising the need to plan for the future, would urge caution in safeguarding land without the fullest evidence and justification that the land is needed for a viable scheme, particularly where the safeguarding may inadvertently impact on a development site that is, in all other cases, deliverable. This includes land for new/enhanced rail serves or road infrastructure to support intensification of existing railway routes. Safeguarding of land for transport projects should only be undertaken with the benefit of evidence fully tested and scrutinised at Examination stage. Where safeguarding is shown to conflict with other objectives, such as housing and employment growth, it should not be considered acceptable unless it can be evidenced as deliverable in a reasonable timeframe and the Plan should ensure that all options are fully considered and the landowners consulted so that the full extent of safeguarding options are investigated before being proposed.	
WENP	West of England Nature Partnership	We are concerned that the rural location of many of the SDLs will increase North Somerset's reliance on private cars, and about the impact that some of the proposed new roads will have on ecologically sensitive sites (including nationally designated SSSIs). We urge multi-modal public transport schemes to be implemented ahead of large scale development to promote their use from the start by new residents.	
Weston Town Council	Weston-super-Mare Town Council	Transport improvements are essential if Weston is to thrive in the future. These must include better facilities for buses in the town and dualling of the railway track into Weston to increase rail capacity. Also recognising that road transport will continue to be important especially for businesses, improvement of Junction 21. In addition the Town Council supports the prioritisation of delivering the long awaited Banwell bypass.	
Winscombe and Sandford Parish Council	Winscombe and Sandford Parish Council	With significant additional housing through approved and speculative planning applications, a new Mendip Spring Garden Village does little to address transport issues for the rural community. There should be an improved and increased bus-service through the parishes with that service continuing into the evenings. There should also be an increase in the number of carriages on local trains (from WSM to Bristol) and modern advances such as an electrification scheme considered.	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	It is recognised that transport infrastructure changes and mitigation would be necessary to deliver the proposed SDL-N but it is considered that the proposals do not deliver a fully integrated and viable transport solution and as such the proposed SDL-N are unsustainable. The proposals do not adequately address: <ul style="list-style-type: none"> • ? the impact of the removal of bridge tolls on the Severn crossings in December 2018 (those using Bristol airport from South Wales already use the rural road network, including Portbury Lane, B3128 and B3128 through Wraxall and Failand). • ? the issue of traffic associated with Bristol Airport (It is understood that a mass transit proposal was discounted in previous studies as being too expensive). • ? the important issues of traffic congestion across the Cumberland Basin • ? how funding will be achieved to allow transport infrastructure to be in place before significant development. • ? the introduction of Quiet Lanes to small narrow minor roads to discourage their use as "rat runs" and support their use for "active modes of travel". 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The assumption that there will be a significant increase in the use of public transport is considered to be highly optimistic.</p> <p>There is no study or report from Railtrack or any train operating companies about capacity and improvements capable at Nailsea and Backwell station to serve the SDL.</p> <p>There have been concerns raised by potential operators of MetroBus about the SDL and the lack of feasibility studies on all MetroBus corridors.</p> <p>It is of concern that there has not been sufficient analysis of the impact on the rural road network, as commuters may not find that public transport will be a timely and cost effective option for their place of work and motorists will not be constrained to use the main road network.</p> <p>If the SDL-N, which rely on the A370, B3130, B3128 and Portbury Lane for commuting, are approved then further mitigations to the road network need to be considered to reflect local detail.</p> <p>We will be responding in more detail in the JSP consultation process but we comment here that there is concern that the modelling described in the JSP Transport Topic Paper 8 (TTP8) update has not been validated using the current traffic flows on the SBL and at the A370 roundabout. The current traffic flows on the SBL are far greater than predicted, particularly during peak commuting times. This raises questions on the rationale and sustainability of the SDL which rely on the A370 to a greater or lesser extent. It is difficult to see the improvements to traffic flow that the mitigation measures bring when comparing figures 3.6 and 4.4 of TTP8.</p>	
Wrington Parish Council	Wrington Parish Council	<p><i>Congestion</i> – How are the ‘cost’ figures calculated and extrapolated to justify the cost figures quoted?</p> <p><i>Encouraging Public Transport</i> – By virtue of its rural (not urban) nature, public transport in villages seems unable to provide a viable and cost effective service. If buses ran at convenient times (eg convenient to out-commuters) or linked in timely manner to other services (eg railways), take up would increase. No operator however wants to run at a loss, so perhaps subsidies need to be reinstated as an encouragement. Why, one has to ask, are there therefore plans to build ‘garden villages’ in areas where there is either poor or no public transport? It will only add to the congestion caused by commuting. It would be far better to retain agricultural land for agriculture and to build/develop in the already despoiled Green Belt area at Ashton Vale.</p> <p>There is no mention under any of the headings relating to pollutants emitted by aircraft at Bristol Airport of the impact that a doubling of air traffic would have on public health, climate change or other environmental pollution, including noise. NO and NO₂ are recognised as polluting gases and also have a bearing on climate change (eg by creating ‘acid rain’).</p> <p>How does encouraging public transport use mitigate Hinkley impacts? This is ‘robbing Peter to pay Paul’.</p> <p>Making all buses electric or non-diesel would have great reduction in CO₂ emissions, but encouraging airport growth would increase NO₂ and particulates as well as being counter-productive in reducing CO₂ from diesel emissions. Building in what is already despoiled Green Belt in Ashton Vale would reduce emissions from commuting and would encourage use of public transport (eg the metrobus) or other greener methods of commuting to work.</p> <p>Rail connections to the airport would further despoil the Green Belt which NSC’s Core Strategy promises to ‘protect’. Words and figures appear to differ here.</p> <p><i>BSWEL</i> – There is already a viable ‘strategic road connection’ – it’s called the A38! In normal circumstances this road is not a problem – it’s only from Bristol Airport to south Bristol that it’s problematic, exacerbated by current failed traffic management regimes. Building two ‘garden villages’ with 4,500+ dwellings will only exacerbate matters further with resultant further intrusions into Green Belt land. There has</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>been no justification demonstrated to support mass transit opportunities between WsM and Bristol Airport (other than it being on Bristol Airport's 'wishlist'). If any mass transit is to be considered, it should be focused on Bristol; that's where the employment is centred and where the mainline railway is. (WsM is only served by a 'loop line' off the main line to the south west.)</p> <p><i>Park & Ride</i> – The sites proposed are therefore to be in 'protected' Green Belt areas? Tut, tut!!!</p>	
Wrington Village Alliance		Transport - support the ideas but these can only be viable if there is funding. Infrastructure is needed before new housing is occupied or new employment opened.	
wwarden		I've noted the various issues listed in the Plan and, particularly, the reference to congestion. As proposed, it's hard to see how any new M5 junction 21a link could lead to anything other than increased congestion in Bristol, obviously impacting on emissions and air quality. Under 'challenges' the need to improve air quality is highlighted, but airport growth on anything like the scale proposed by BA certainly won't help.	

Document Part Name

Q40. Are there any other options for how the Local Plan can deliver self-build and custom housing schemes?

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	Self-Build Policy – to encourage the provision of self-build plots, the council should consider publishing the register so that on small sites builders can identify individuals or groups who want to self-build. This would open new options for supporting their development financing. For larger schemes, say over 10 units, NSC should (subject to viability) set a target for provision of serviced plots similar to that for affordable housing.	
Blagdon PC	Blagdon Parish Council	It is unlikely that self-build will make any significant contribution to meeting overall housing needs. No major effort should be invested in this area.	
Bleadon Parish Council		We welcome the principle of requiring a proportion of self-build plots on residential schemes of a certain size.	
Bleadon Parish Council		We welcome the principle of requiring a proportion of self-build plots on residential schemes of a certain size.	
CPRE Avonside	CPRE Avonside, North Somerset District	Without knowing the number on the current register for self-build it is difficult to offer options.	
Ecomotive Ltd		1. Introduction	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>This response has been developed by Community Led Housing West, a support and advice hub set up to help communities in the West of England build their own solutions to the housing crisis. We have a vision for a thriving community-led housing sector for the West of England, based on research into the opportunities, barriers and challenges currently facing the community-led housing (CLH) sector and drawing on best practice, case studies, academic and industry research.</p> <p>This document sets the scene for how community-led housing can contribute to solving the diversity of challenges faced by North Somerset in the period of the next Local Plan (and beyond), before going on to answer the specific questions posed in the Issues and Options paper. We have not responded to all questions in the consultation document but have focused our attention on those more directly relevant to our mission and our expertise.</p> <p>2. What is community-led housing?</p> <p>Community-led housing is residential accommodation and ancillary space and facilities developed and/or managed by local people or residents, in not for profit organisational structures. The range of models that can be adopted for providing CLH includes self-build housing, co-housing, co-operatives, tenant controlled housing, and community land trusts (CLTs). The Building and Social Housing Foundation's (BSHF) criteria for projects to qualify as CLH are:</p> <ul style="list-style-type: none"> • Community integrally involved throughout the process • Community groups/organisation taking a long term formal role in stewardship of the land and the homes • Benefits to the local area and or community of interest must be clearly defined and legally protected in perpetuity. <p>CLH can involve new-build, regeneration and the use of existing buildings. CLH groups may involve members from the same geographical area or members with a shared community interest or common link (e.g. Refugees, Older People, LGBT).</p> <p>There are three main ways in which community-led groups become involved in the CLH process as set out by the Building and Social Housing Foundation. Group-led: Grassroots groups respond to local housing need or demand, or people decide to develop their own homes.</p> <p>Extension of community based activity: Existing community based organisations with local roots decide to provide housing in addition to their current activities.</p> <p>2 Developer-Community partnership: A local authority, landowner, housing association or small builder which wants to provide housing that benefits the local area in perpetuity, draws on community-led housing expertise to recruit 'founder members' from within the community and support them to take over ownership, stewardship and/or management of the homes.</p> <p>Because CLH often includes an element of self-build housing (i.e. the future residents are involved in the process of design, management and/or construction of their homes), CLH is likely to form an important mechanism for local authorities to meet their obligations under the Self-build and Custom Housebuilding Act 2015, which requires them to grant planning permission in respect to the number of serviced plots that have been requested on their Self Build Register.</p> <p>3. Why is a policy framework for CLH needed?</p> <p>North Somerset faces significant challenges in:</p> <ul style="list-style-type: none"> • increasing the availability of affordable housing, both rental and shared ownership - particularly in higher-priced areas of the district • ensuring that new development is appropriate in scale and quality and meets the needs of individuals and communities - as well as protecting and enhancing the environment 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> ● tackling the gap in quality of life between affluent and deprived areas ● an ageing population, with around 30% of the population projected to be over the age of 65 by 20301 ● supporting the expansion of a future-proofed food, farming and horticultural sector (as evidenced by the priorities for the West of England LEADER programme) <p>There are about 3,300 households currently waiting on the HomeChoice register for North Somerset, with over 300 new applicants every month, but only around 600 properties become available each year. These are widely viewed as the tip of a larger but less visible iceberg of overcrowding, living with parents and other forms of housing stress. One in five young people in the UK have sofa surfed in the last year. The recent tragedy at Grenfell Tower has highlighted the importance of sustaining communities and of raising standards in affordable housing provision.</p> <p>The average house price in North Somerset in 2017 was £271,631, almost 10 times the average income in the district. This masks some significant differences across the area - for example although the average house price this year in Weston-super-Mare was £228k, in Portishead it was £356k, in Long Ashton around £400k and in Churchill £480k3. There are very few opportunities in these higher-priced areas for first time buyers to access home ownership, and generally low availability of affordable homes for rent or shared ownership.</p> <p>Against these worrying trends, there is growing enthusiasm from individuals, new groups and existing community-based organisations to become actively involved in tackling local housing needs. Facilitating and energising this grass roots movement would give access to new funding streams and help to secure support from communities for new developments. It would also provide genuine opportunities to build more resilient and self-supporting communities, less dependent on local authority services and other interventions.</p> <p>North Somerset: Area Profile. Quartet Community Foundation. https://quartetcf.org.uk/wpcontent/uploads/2015/05/north-somerset-area-profile-final.pdf</p> <p>2 http://www.westofenglandrdp.org.uk/priorities-inspiration/3</p> <p>3 www.zoopla.com</p> <p>Community-based housing projects can also find innovative ways to use stuck sites and small sites, producing exemplar homes on them with high quality design and high environmental standards in a range of sizes and tenures. Evidence from existing CLH schemes across the UK demonstrates the practicality of the CLH approach and the positive impact it can have both on residents and the wider community. CLH projects have some distinctive advantages over housing association and local authority initiatives, in that they are able to attract funding from innovative sources and also to leverage the energy and creativity of communities and young families in the ‘intermediate’ market as a major new resource. The asset locks provided by community-based legal frameworks allow CLH organisations to preserve the affordability of housing and other assets for the long term. They can also capture the land value of custom build schemes, housing co-ops, sheltered housing - and similar accommodation identified as locally needed - within a longterm stewardship framework outside the sort-termism and ideological imperatives of public provision. See Appendix 1 for a full list of the benefits of CLH developments.</p> <p>Locally in the West of England, CLH projects to date have been small in scale due to limitations on capacity, experience, available land and access to finance. But momentum is growing, and with the Government making available £60m a year to the community-led housing sector since 2016, there are now more opportunities than ever for these forms of housing delivery to make a real difference at the local level. A useful overview of need within the West of England area was gathered from the CLH questionnaire that was circulated by the developing Community Led Housing West partnership in early summer 2017. This gave clear evidence of strong interest in CLH from existing and new / forming groups. Significantly, 92% of groups said that finding and securing land was a critical need, and 70% identified the need to work with local authorities to find suitable land as a high priority. This indicates that finding routes to make land available for community-led schemes is a key action that could help unlock the potential of this sector. The Local Plan presents a clear opportunity to achieve this.</p> <p>4. The role of planning policy in promoting community-led housing</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Community Led Housing West has identified a suite of planning policy measures that could be used to support community-led housing in North Somerset. We urge the inclusion of these within the new Local Plan, in order to set the scene for win-win solutions to the issues facing North Somerset during the next two decades:</p> <p>A. Using the site allocation process to identify specific sites for CLH</p> <p>B. Introducing policies for the inclusion of community-led housing and self-build provision in proposals for large sites</p> <p>C. Reviewing other local authority CLH planning policies to see which would be of benefit for North Somerset to adopt</p> <p>D. Supporting communities to develop CLH policies within their Neighbourhood Plans</p> <p>E. Developing an urban alternative to the rural exception site policy - e.g. a presumption in favour of community-led affordable housing development on brownfield sites, where certain conditions are met</p> <p>F. Establishing a light-touch procedure for small sites and small groups which provides flexibility for CLH schemes (space standards, density, vehicle numbers) where the community supports the scheme</p> <p>G. Establishing a policy to support the development of sustainable land-based communities in rural areas</p> <p>H. Ensure that the design of CLH schemes meets best practice for inclusion of accessibility and health and well-being measures</p> <p>I. Allocating a planning officer to work with the CLH sector</p> <p>J. Working with the CLH sector to consider other planning policy instruments that could promote long-term stewardship of land by communities.</p>	
Ecomotive Ltd		<p>We support the establishment of a new policy on Self and Custom Build. While self build is often considered on a plot-by-plot basis, this should also include specific mechanisms to support self and custom build delivered through a community-led scheme - e.g. by a community land trust or housing co-operative, and/or including community-focused design features such as cohousing.</p>	
Gladman Developments Ltd	Gladman Developments	<p>Whilst Gladman support the provision of self-build and custom build plots, any policy should not prescribe a specific percentage of plots to be made available on all sites above a certain threshold. This approach merely changes housing delivery from one form of house to another and can effectively sterilise plots from contributing to the housing land supply if no end user can be found to deliver the plot. Any requirement for such plots should also be based on robust and specific evidence of the need for such units as required by the Planning Practice Guidance.</p>	
Hayes Family and Mr Cope		<p>There is a requirement for LPAs to provide policies relating to the provision of self-build and custom housebuilding. Research and evidence indicates that self-builders do not want to build a plot on large residential developments built out by housebuilders; instead the need is for one-off bespoke properties.</p>	
Home Builders Federation Ltd (S Green)	Home Builders Federation Ltd	<p>The HBF is supportive of both the allocation of sites and an exceptions policy approach for self / custom build housing schemes. The HBF is not supportive of a proportion of self / custom build plots on housing sites of a certain size. This policy approach only changes housing delivery from one form of house building to another without any</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>consequential additional contribution to boosting housing supply. If these plots are not developed by self / custom builders then these undeveloped plots are effectively removed from the HLS unless the Council provides a mechanism by which these dwellings may be developed by the original non self / custom builder in a timely manner. Before introducing any such policy the Council should consider the practicalities of health & safety, working hours, length of build programme, etc. as well as viability assessing any adverse impacts. There is the loss of Community Infrastructure Levy (CIL) contributions as self / custom build properties are exempt. Any policy requirement for self / custom build serviced plots on housing sites of a certain size should be fully justified and supported by evidence of need. The Council should assess such housing needs in the SHMAA as set out in the NPPG (ID 2a-021) collating from reliable local information (including the number of validated registrations on the Councils Self / Custom Build Registers) the demand from people wishing to build their own homes. The Council should analyse the preferences of entries on the Self Build Registers often only individual plots in rural locations are sought as opposed to plots on housing sites of a certain size. The Register may not provide the justification for this policy approach.</p>	
J Howard		<p>There should be an ability for custom builders to have preferential treatment when bringing forward sites for self build on non allocated sites where the demand evidenced by the register is not being met elsewhere in the district.</p>	
Libbyrich		<p>This could be encouraged by releases of small sites around the settlement boundary</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>Whilst Policy DM34 refers to facilitating self-build and custom-build schemes it provides no other specific guidance. Firstly in order to justify provision of self-build and custom-build housing it will be necessary for the Council to demonstrate evidence of need. This should be addressed in the SHMA using data in the Council's Self-Build and Custom House Building register. However the register on its own is a blunt tool and NPPG 57-011 advises that Authorities should use the demand data from the registers supported by additional data from secondary sources.</p> <p>Then if there are appropriate people on the register the question of whether are they in a position to proceed needs to be assessed.</p> <ul style="list-style-type: none"> • Do they have savings? • How much deposit can they pay? • Do they need additional finance? • If so, what is the maximum they can access and afford – lack of suitable mortgages have been an impediment in the past? • Do they have the necessary expertise to manage a self-build project or building experience or finances to instruct others? <p>PHSV support the identification of additional sites specifically for self-build housing. However we do not support the requirement for a proportion of self-build plots on other residential allocations. National Planning Policy and Guidance is to significantly boost supply of homes and increase delivery. Relying on plots on normal residential sites does not increase supply but merely changes the provider of the same number of units. It can also impact on delivery. Our experience elsewhere suggests self-build homes have the opposite effect due to practical and management problems relating to health and safety, working hours and the length of build including:</p> <ul style="list-style-type: none"> • Slow take up and Reserve Matters periods running out; • Ad hoc builders turning up outside specified working hours; • Storage of materials if there is limited room on individual self-build plots; • Purchasers having to stop building due to unemployment/lack of funds or bad site management; • Our own purchaser dissatisfaction where building continues on site which was expected to finish when they moved in; • Conflicts with the Design and Access Statement for the site. <p>In respect of viability, the provision of self-build plots will also need to form part of the Viability Assessment of the plan's policies and proposals as set out in our comments on viability on affordable housing below. NPPG57-025 in addition sets out other ways the Councils' can support self-build and custom-build housing</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		including using their own land, engaging with landowners and working with custom-build developers all of which may enable the allocation of specific self-build plots rather than relying on self-build plots on other residential schemes.	
Portishead Town Council	Portishead Town Council	Welcome a policy to encourage self-build as it will provide a local need and encourage variety of design and type.	
Taylor Wimpey - The Vale		<p>Q40. Self-Build Policy</p> <p>1.34. At a time when there is a need to significantly boost housing delivery careful consideration needs to be given to the impact of introducing any % requirement for self-build plots on allocated sites delivery.</p> <p>1.35. Many people that are interested in self-build as a housing option are looking for something that is different and unique to the type of housing that is typically delivered on larger allocated sites. As such, co-locating parcels of self-build within wider developments is not necessarily the most feasible way of meeting any demand that exists. Equally, there can be nervousness on the part of purchasers of houses on the “main” development as to what development might come forward in close proximity to their houses.</p> <p>1.36. It may be most practical to consider how small and medium sites could be specifically allocated for self build, were supported by the land owner, instead of a % requirement on larger sites.</p>	
wwarden		I've note this proposal and the reference to the relevant Act. While I appreciate the background, I suspect that a requirement for self-build plots to be included in larger residential schemes would create difficulties.	

Document Part Name

Q41. Do you have any views on the review of affordable housing policies?

Respondent Name	Respondent Organisation	Comment	Attached documents
Abbots Leigh Parish Council		The housing survey conducted in our NPA showed significant need for affordable housing (100 homes). We welcome a review of affordable housing policies in the context of the new Local Plan and in particular the significance of that section of the National Planning Policy Framework which sets out (paras 67-82) the role of small and medium sized sites, the contribution of neighbourhood planning groups, the importance of entry-level exception sites.	
Alex		The plan needs to make much clearer what is meant by “affordable housing” in each location. Both social housing for long term rental AND low cost homes to purchase are required. Neither will appear in piecemeal commercial development merely through attempts to enforce planning requirements. The council will need to invest heavily in providing housing directly, and should make it a priority in their borrowing strategy, rather than speculating on shopping centres.	
Alex Child	The Planning Bureau ltd	It is critical that any affordable housing policy should be based on a robust assessment of viability which considers the full implications of the economics of retirement housing. In uncertain economic circumstances, any viability assessment should consider the potential for an economic downturn on the ability to provide affordable housing	

Respondent Name	Respondent Organisation	Comment	Attached documents
		through the planning system. Affordable housing policy should be flexible enough to cope with downturns in the economy. In current conditions, any target should be "realistic" and not "aspirational". It will be critical for the Viability Assessment that will underpin the Local Plan to recognise this.	
Andy		Your plans for new housing seem to result in ever more executive homes, which rely on cars as the principle transport option. Judging on your track record to date, affordable housing will represent somewhere between 10 - 20% of the new build and sometimes even this small amount is not achieved. What you are creating in North Somerset, is a large, low density, housing estate for Bristol commuters. The roads in this area are already at capacity and the planned increase in passenger numbers will make the situation even worse. Piling more and more development into a rural area will destroy it. I am strongly opposed to your plans and think that the whole JSP approach needs to be reconsidered.	
Aston	Aston and Co UK	The existing policy of no affordable provision below 11 units assists small builder/developers and we support that initiative. If a new policy is introduced for Live-Work units and these are provided for young local people, at affordable rent/purchase price these should count as part of the affordable provision. The 35% minimum target contained in the JSP is a reasonable and is supported.	
Banwell Parish Council	Banwell Parish Council	The policies should be reviewed to ensure that there is adequate provision of affordable housing commensurate with local need. Viability assessments by developers after planning permission has been approved should not be allowed to reduce the required provision of affordable housing unless unforeseen circumstances on site can be shown to increase the development costs.	
Blagdon PC	Blagdon Parish Council	The Local Plan should reflect latest guidance but must guarantee that developers deliver the required numbers.	
Bleadon Parish Council		We believe that the provision of appropriate and affordable housing is essential to the health and sustainability of Bleadon village, enabling people at every stage of life to remain in the village. This should be provided on sites throughout the village.	
Cleeve Parish Council	Cleeve Parish Council	CPC supports the JSP requirement of a minimum target of 35% affordable housing to be delivered on sites of 5 dwellings or more	
Clevedon Town Council	Clevedon Town Council	<i>What is the Joint Spatial Plan challenge for North Somerset? (Page 4) & Affordable Housing (Page 86)</i> More affordable housing/starter homes are needed in Clevedon, ensuring that young families remain living and working in the town. To encourage the principles of building more social housing. Linked in Housing Associations.	
Coln Residential (DLP Planning)		Section 9 of the NLP discusses the review of the adopted affordable housing policies. For North Somerset. Policy 3 of the JSP Publication Document currently identifies a minimum target of 35% affordable housing to be delivered on sites of 5 dwellings or more or sites larger than 0.2ha, whichever is the lower. Paragraph 63 of the NPPF (July 2018) states that affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). In terms of residential development, the glossary in the NPPF defines 'major	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>development' as housing development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more.</p> <p>Coln Residential contend that the affordable housing thresholds currently proposed in the JSP are inconsistent with national guidance. As detailed in previous representations to the JSP consultation stages, Coln Residential would argue that it is more appropriate to set out the affordable housing requirement in the four authorities emerging Local Plans, with each authority continuing to set differing affordable housing zones where necessary in order to reflect local circumstances. Coln Residential deem this to be more appropriate than the current blanket approach proposed in the JSP.</p>	
Coln Residential (DLP Planning)		Coln Residential contend that the NLP policy on affordable housing should be compliant with the revised NPPF and supported by an appropriate viability assessment.	
Congresbury Parish Council	Congresbury Parish Council	We expect North Somerset Council to adopt the JSP 35% affordable housing condition on sites over a certain size. We encourage North Somerset Council to apply its policies when granting planning permission. There have been a number of examples where the council has not applied existing policies.	
CPRE Avonside	CPRE Avonside, North Somerset District	Affordable housing policy should encourage delivery of social housing not related to market prices and aim to meet the needs of the population of North Somerset.	
Cresten		Genuinely affordable housing, available to local people in the area where they have family ties, is badly needed. Developers should be required to provide a higher percentage of affordable housing.	
D Yeates	Savills	<p>It is important that the new Local Plan sets out the level and type of affordable housing provision required together with other necessary infrastructure but such policies should not undermine the deliverability of the Local Plan, consistent with paragraph 34 of the revised NPPF.</p> <p>The Council's current adopted policy requiring off-site affordable housing contributions on sites between 5-9 dwellings is now inconsistent with the provisions of the revised NPPF and national Planning Practice Guidance. Therefore, if the new Local Plan is to be compliant with the NPPF then development should not be subject to such a scale of obligations and policy burdens that viability is threatened.</p> <p>The Council's definition of affordable housing should therefore be updated to reflect the contents of the Revised NPPF (July 2018).</p> <p>Therefore, if the new Local Plan is to be compliant with the NPPF then development should not be subject to such a scale of obligations and policy burdens that viability is threatened.</p> <p>The Council's definition of affordable housing should therefore be updated to reflect the contents of the Revised NPPF (July 2018).</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	The housing survey conducted in our NPA showed significant need for affordable housing (100 homes). We welcome a review of affordable housing policies in the context of the new Local Plan and in particular the significance of that section of the National Planning Policy Framework which sets out (paras 67-82) the role of small and medium sized sites, the contribution of neighbourhood planning groups, the importance of entry-level exception sites.	
Ecomotive Ltd		<p>We recommend that affordable housing policy should be revised to include the following elements:</p> <p>A. Allocating some receipts from Right to Buy sales to fund CLH housing (see Leeds and Hull for examples)</p> <p>B. Facilitating use of the Community Housing Fund and section 106 receipts by CLH groups without the need to become registered providers</p> <p>C. Make grants conditional on community led projects on some schemes</p> <p>D. Make land disposals conditional on the participation of community led initiatives in development proposals on some schemes</p> <p>E. Include provisions to support for affordable housing delivered through self build, for example as part of a community-led scheme</p> <p>F. A named Housing Officer and Development Control planner who can liaise with CLH projects and support pre-application and application work</p> <p>G. Providing low interest and no interest loan and loan guarantees for strategic community led housing projects</p>	
Gladman Developments Ltd	Gladman Developments	<p>4.3.23 The level of affordable housing sought on residential developments should be determined through the viability assessment of the Local Plan. Other policy provisions should also be considered alongside the delivery of affordable in this assessment. Whilst the viability assessment will determine the maximum level of affordable housing that could be sought from development schemes, Gladman would suggest that the Council err on the side of caution and instead seek a realistic level of affordable housing that can be delivered alongside any other necessary policy requirements.</p> <p>4.3.24 North Somerset has delivered a good consistent amount of affordable housing across the authority area since 2012 with an overall total of 704 affordable homes delivered against a target of 750 (150 affordable homes per annum requirement) over the previous five years. This demonstrates that the current affordable housing percentage is achievable across the authority area for applicants to confidently deliver a policy compliant amount of affordable housing on their respective sites.</p> <p>4.3.25 In relation to the trigger for seeking affordable housing, Gladman would like to draw the Council's attention to paragraphs 63 and 64 of the revised Framework which provide guidance when seeking the provision of affordable housing on residential developments.</p>	
GVA Grimley	GVA Grimley	St Modwen's main concern is the JSP requirement of 35% target on sites of 5 or more dwellings and this being applied in North Somerset, given the significant viability concerns evident from experience within Weston-super-Mare to date.	
Hayes Family and Mr Cope		We would suggest that the new policies reflect the revised definition of affordable housing within NPPF2. We would also suggest that evidence / research is undertaken in relation to viability to provide 35% affordable housing on developments of 5 or more – there is a risk of 'squeezing out' small and medium housebuilders which is critical to maintaining competition in the housing market and diversity in design.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Home Builders Federation Ltd (S Green)	Home Builders Federation Ltd	<p>The new Local Plan should set out the level and type of affordable housing provision required together with other necessary infrastructure but such policies should not undermine the deliverability of the Local Plan (2018 NPPF para 34). Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on the viability or otherwise of development. The cumulative burden of policy requirements should be set so that most sites are deliverable without further viability assessment negotiations (2018 NPPF para 57). It is important that the Council understands and tests the influence of all inputs on viability as this determines whether or not land is released for development. The Harman Report highlighted that "<i>what ultimately matters for housing delivery is whether the value received by land owners is sufficient to persuade him or her to sell their land for development</i>".</p> <p>The HBF have objected to Policy 3 : Affordable Housing of the WoE JSP which proposes a minimum target of 35% affordable housing on sites of 5 or more dwellings. As set out in the HBF representation to the WoE JSP consultation the proposed site threshold of 5 or more dwellings is unjustified and inconsistent with national policy. Furthermore insufficient viability testing has been undertaken. The Council is reminded that if the new Local Plan is to be compliant with the NPPF then development should not be subject to such a scale of obligations and policy burdens that viability is threatened.</p> <p>The Council's definition of affordable housing should be aligned with the Government's Affordable Housing definition set out in the 2018 NPPF.</p>	
Ian	Mr	There is a shortage of affordable housing in North Somerset, but not of other types of housing. Any development should be at least 90% affordable, if not 100%. This may be mean lower profits for developers, but I'm sure they can still make a profit.	
J Gower-Crane		Information on this topic is conflicting and scarce. What is the cost of an affordable house?	
Kit Stokes	StokesMorgan Planning Ltd	This will prevent small scale builders from taking on difficult sites where there are few economies of scale and development will prove unviable. This is the reason national policy in the NPPF establishes a threshold of 10 units.	
Long Ashton Parish Council	Long Ashton Parish Council	The Plan should consider how the Local Planning Authority can undertake the development of affordable housing under its control and ownership.	
M Hayman	.	We support the need for an increase in affordable housing being built in the area but accept the proposals of the council.	
Mead Realisations Ltd		A full review of affordable housing is supported.	
Mr and Mrs Dobson		The JSP states that 'The four UAs have sought to maximise the provision of Affordable Housing as far as possible, making it a priority in the formulation of the spatial strategy and increasing the overall supply of housing in order to increase Affordable Housing supply. Whilst the identified needs for Affordable Housing will not be fully met, this strategy will entail a substantial boost in the supply of Affordable Housing for the sub-region and will result in a step change in provision.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>There appears to be an acceptance that the Affordable Housing Target will not be met as a result of the 'Viability' process and a lack of alternative investment/public subsidy, which is disappointing and affects the soundness of the plan in terms of providing the right type of homes. There is a need for more affordable housing for young people and a mechanism that ensures local residents are given priority when homes are allocated i.e. a residency test.</p> <p>Modifications suggested</p> <ul style="list-style-type: none"> • <i>Make a stronger statement on Affordable Housing and a commitment to lobby Government to avoid the watering down of the commitment to provide Affordable Housing in the planning process.</i> 	
N Cooper	Claverham Future	<p>The policies are toothless and affordable housing will be avoided as ever is the case. To affect the housing market the council should seek to build permanently for rent, or if sold permanent control of re-sale price at no more than bank rate per annum with any higher price garnered by the council into a hypothecated fund for new build. The shared scheme with BANES Equus could well be a money earner for North Somerset BUT if long term revenue and impact on housing NEED (not want) is the aim then North Somerset needs to deliver housing for rent not just capital receipt one-offs in the same market as developers.</p>	
Nailsea Town Council	Nailsea Town Council	<p>Affordable housing policy needs to be widened to ensure due regard is given to low cost market housing as well as social housing. These policies need to be coherent with housing density policy and the population demographics.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>The plan needs to take a realistic view of what level of affordable housing is deliverable, given the failure of the existing Core Strategy policy.</p> <p>We note that the JSP proposes a target of 35% affordable housing to be delivered on sites of 5 dwellings or more. However this policy is untested at examination and carries very little weight both in terms of the target figure and its application to sites of 5-10 units. In addition in applying the final JSP policy, the Council will need to produce its own evidence to justify the Local Plan policy and in particular viability evidence in accordance with national guidance (see comments below).</p> <p>The Core Strategy policy CS16 sets a benchmark of 30% as a starting point but this target has never been met in any year since the start of the plan period in 2006. Whilst the number and percentage of affordable homes provided naturally fluctuated throughout the plan period depending on the supply overall, the plan has so far delivered 1,509 affordable housing units out of a total housing provision of 8,847 or only 17% over an 11 year period. The 30% target has only been close to being met once in 2008/9 when 27% of the 935 total housing provision was for affordable housing and the percentage has fluctuated between that and a low of 5% in 2011/12. The result is a substantial shortfall with 12,138 left to build by 2025/26 where even the current 17% rate would require 229 affordable homes per annum and 30% would require 405 per annum.</p> <p>There is also a miss-match in the Core Strategy policies and targets. Whilst CS16 identifies a target of 30%, paragraph 3.225 says 'the Council target is for 150 affordable houses to be provided per annum. On that basis 3,000 homes would be the output of affordable houses for the plan period which equates to 14% of the minimum housing requirement of 20,985.</p> <p>All of this demonstrates targets of either 30% or 35% are unrealistic and dramatically overstate what is likely to be provided, which over a long period has averaged only 17%.</p> <p>The policy also needs to reflect the new definition of affordable housing in the NPPF which includes starter homes, discounted market sell housing and other affordable routes to homeownership (including those which may not be funded by public grants).</p> <p><u>Affordable Housing – Assessment of Viability</u></p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		Paragraph 34 of the framework says that ' <i>plans should set out the contributions expected from development. This should include setting out <u>the levels and types of affordable housing provision required along with other information.</u></i> ' Rather than a simple demonstration that the proposals are viable it is now a requirement that ' <i>such policies should not undermine the deliverability of the plan.</i> ' In addition it is important to recognise it is the responsibility of the Council to ensure that the policies and proposals of the plan are viable so that ' <i>where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable</i> ' (NPPF paragraph 57). The Council will need to prepare an updated viability assessment to determine whether the required affordable housing target together with other policy requirements and infrastructure provision is both viable and deliverable.	
Portishead Town Council	Portishead Town Council	Need a balance of housing mix of size and tenure.	
Puxton Parish Council	Puxton PC	Small rural parishes need affordable housing to be provisioned for, not a spin off from major urban housing developments, but as a strategic imperative to preserve the sinews of the rural community. This does not appear to be recognised within this version of the plan..	
Rentplus UK Ltd		<p>We represent Rentplus UK Ltd, an innovative company providing affordable rent to buy housing for working people; aspiring to home ownership with an accessible route to achieve their dream through the rent - save - own model.</p> <p>All Rentplus dwellings are leased to Registered Providers at an affordable rent for up to 20 years – the RP manages and maintains each property, giving tenants the assurance of renting through a responsible housing provider. This builds resilience into local communities; each Rentplus development is sold on a phased basis every 5 years – those homes not sold at year 5 are re-let to tenants for a further 5 years. This form of tenure and development enables partner Housing Associations to diversify local housing stock and for local households to find the right type of home for them.</p> <p>Rentplus developments delivered in partnership across England with housing associations have already delivered significant benefits to those people who could not previously access housing that was affordable to them. Case studies are set out on the Rentplus website (accessible via http://www.rentplus-uk.com/about/case-studies), highlighting the difference that a broad mix of affordable housing can make to communities – and that the delivery of rent to buy can make to people who could not access social or affordable rent, or shared ownership previously, or were able to move on and free up those homes for others in greater need.</p> <p>The recently published NPPF2 contains new policies relating to the assessment of housing needs, housing supply and the tenures of affordable housing that local planning authorities must assess and seek to deliver. We are pleased to see this acknowledged in the Issues and Options document. The new local plan is therefore well timed to review how well the authority has delivered against its housing needs and how it can best plan to meet those needs in the future, considering the new definition of affordable housing and any uplift in supply required to deliver that.</p> <p>Question 41 – Do you have any views on the review of Affordable Housing Policy?</p> <p>There is significant unmet need for affordable housing in North Somerset, and this is well recognised by the Council and highlighted throughout its existing development plan. Affordability is however constraining access to home ownership, keeping many potential home owners locked in private rented accommodation or in other affordable tenures without support towards ownership. Access to a deposit remains one of the most challenging blockers to accessing home ownership which intermediate affordable housing does not resolve; the Council should take a proactive approach to welcoming the delivery of the wider range of affordable tenures as now set out in the revised Framework to encourage a more diverse housing stock and to improve the ability of all developers to deliver an appropriate and higher quantum of affordable housing. A new assessment of local housing need through as revised SHMA must take into account the NPPF2 definition of affordable housing as this diversifies the types of housing that may be delivered to meet the diverse needs of local people. This work may uncover additional levels of concealed housing need and point more directly to the need for tenures assisting working households into home ownership. A methodology for assessing housing need, including rent to buy has been produced by Lichfields and is enclosed with this representation to assist with this work. We encourage the Council to look closely at the need for all types of affordable housing as this will widen the Council's ability to meet all housing needs over the lifetime of the new plan. We recommend that the Council review its housing need and consider the viability of its affordable housing policy, including its threshold and percentage requirement, and the way in which it seeks developer contributions to this.</p> <p>The Council should be seeking to be as ambitious as it can in setting a whole-plan affordable housing target, percentage requirement and threshold(s) for delivering affordable housing from all viable developments.</p> <p>The Government's small sites guidance set out in the Planning Practice Guidance is guidance only, and not policy; as a material consideration it does not prevent the Council from taking a different view in its plan-making. Our experience with other local planning authorities, and the approach being taken by the Planning Inspectorate at appeal,</p>	<p>Lichfields Nov 2017 - Assessing the Need for Rent to Buy Housing.pdf (710 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>highlights that it is the particular circumstances of each local planning authority that guides whether small sites should contribute to delivering affordable housing. With regards to the circumstances in which affordable housing is sought, the Government has now indicated through NPPF2, and the new advice within it relating to the assessment of housing needs, the tenures of affordable housing that local planning authorities must assess and seek to deliver, and the circumstances in which it can require this. It is important in light of this revised Framework that the Council consider how its policies will be used in determining planning applications in the long term, assessing the need and planning for the delivery of the new, wider types of affordable housing to meet local housing needs.</p> <p>For the new Local Plan to be effective over the long term the Council should look to encourage a wide range of affordable housing, with its policies and supporting text reflecting the new Framework phrasing which seeks to deliver a greater overall level of affordable housing to meet needs. The new definitions recognise that delivery of social and affordable rented housing needs to be alongside other forms of housing, enabling more families to stay in areas they wish to live in and from which they can build up savings.</p> <p>The delivery of rent to buy alongside other rented and sale tenures delivers tangible benefits to local people, housing associations and local authorities by meeting needs that would otherwise go unmet by the core range of social and affordable rent, and intermediate home ownership tenures. As set out in our comments above, the ability to save for a deposit is significantly constrained for many by renting in private rented accommodation, while access to other affordable tenures can be constrained by existing debts. The period of rent (capped at the lower of Local Housing Allowance or 80% of private rents) provides ample time to build up a good credit history and to save for a mortgage deposit, opening up the opportunity of purchase for many more people. This provides a clear benefit when delivered alongside other rented and ownership tenures, delivering more genuinely mixed and balanced communities and enabling a greater number of people to access housing and get off the local housing waiting list.</p>	
Simon		<p>Affordable housing policies should consider the affordability of public and other transport from their location to the major areas of employment. The cost of travelling from many of the proposed garden villages to employment in Weston and Bristol should be considered.</p>	
South West Harp Planning Consortium		<p>We represent the South West HARP Planning Consortium which includes all the leading Housing Association Registered Providers (HARPs) across the South West. Our clients' principal concern is to optimise the provision of affordable housing through the preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the South West region.</p> <p>The publication of this Issues and Options consultation is timely, considering that the revised NPPF was published in July 2018 and has significant implications for the way in which evidence is produced for local plans and the way in which development should be planned for, particularly in relation to residential development. The introduction of a new definition of affordable housing encompassing a wider range of tenures is one of the most important changes seen in planning in for housing in recent years, making the way in which North Somerset seeks to address housing needs critical to the future of local people.</p> <p>In launching the (then draft) NPPF Prime Minister Theresa May stated: "...to stop the seemingly endless rise in house prices, we simply have to build more homes – especially in the places where un-affordability is greatest."</p> <p>As an instrument to address the growing affordability crisis, the NPPF includes a new standard methodology to address the baseline measure of housing needs against which housing targets must be derived. With the publication of further changes to this measure in consultation form in October 2018 it is clear that the Government wishes to encourage an upswing in development across England. With the local affordability ratio standing at 9.9 and a household income of £62,087 required to afford an averagely priced house in North Somerset it is clear that the Local Plan needs to be ambitious in setting new targets for housing generally and affordable housing specifically.</p> <p>Question 41 – Do you have any views on the review of Affordable Housing Policy? The significant unmet need for affordable housing, means that the Council needs to continue to take a proactive approach to welcoming the delivery of affordable housing. Incorporating the wider definition of affordable tenures will be important in ensuring consistency with the revised Framework, and this must be done with the support of a new assessment of how these tenures will meet local housing needs, including any measures required to ensure that all needs are addressed.</p> <p>The revised affordable housing policy should reflect the NPPF in encouraging a more diverse housing stock, whilst enabling the delivery of sufficient numbers of housing to improve the ability of developers to deliver an appropriate and higher quantum of affordable housing. This must now include an allowance for at least 10% of dwellings on major developments to be delivered as affordable home ownership, where this will meet local needs and deliver viable schemes.</p> <p>As noted above, setting a specific target for affordable housing over the lifetime of the Plan will assist the Council in effectively monitoring delivery and responding to any shortfalls with additional supply.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Similarly, the Council should be ambitious in setting a percentage requirement and threshold(s) for delivering affordable housing that properly reflect local housing need, ensuring that the target of 35% set in the Joint Spatial Plan can be delivered in North Somerset across the Plan period.</p> <p>The introduction of entry-level exception sites in the NPPF is a welcome addition to the opportunities Registered Providers have to meet housing needs in areas that may not otherwise have been considered suitable for general housing proposals. We encourage the Council to introduce a locally specific policy on these that enables delivery of affordable housing-led schemes that are aimed at first-time buyers and renters, and seek to allocate land specifically for these sites to encourage further delivery. It is important to note that unlike the policy on rural exception sites the NPPF does not seek to secure affordable housing delivered on entry-level exception sites in perpetuity so it would be inappropriate to require this in a local policy.</p> <p>We also note that when drafting the new policy it is important for this to consider the most effective wording that encourages and enables delivery of affordable housing, without placing unnecessary restrictions and additional hurdles to frustrate delivery. The current requirement in Policy DM34 for development of affordable housing to be supported by evidence of need through the latest SHMA or local needs surveys is unnecessarily restrictive and, in the case of the local needs surveys, a very costly exercise for RPs that can overlook the true level of need. The affordable housing policy introduced through the new Local Plan should encourage use of appropriate supporting evidence, as set out in an Affordable Housing Statement accompanying each application.</p>	
Taylor Wimpey - The Vale		<p>Q41. Affordable Housing</p> <p>1.37. This is a strategic matter than is being set by the JSP and the Local Plan should take the lead from it.</p> <p>1.38. The Council's definition of affordable housing should be updated to reflect the contents of the Revised NPPF (July 2018).</p>	
Taylor Wimpey - Turley Associates	Turley Associates Ltd	<p>The proposal to seek affordable housing on sites of 5 or more dwellings is not supported. This low threshold is not consistent with national policy, and no justification has been provided for this. The new Local Plan needs to be consistent with national policy that states that provision of affordable housing should not be sought for residential developments that are not major developments.</p>	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	<p>Section 9 of the NLP discusses the review of the adopted affordable housing policies for North Somerset. Policy 3 of the JSP Publication Document currently identifies a minimum target of 35% affordable housing to be delivered on sites of 5 dwellings or more or sites larger than 0.2ha, whichever is the lower.</p> <p>Paragraph 63 of the NPPF (July 2018) states that affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). In terms of residential development, the glossary in the NPPF defines 'major development' as housing development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more.</p> <p>TW contend that the affordable housing thresholds currently proposed in the JSP are inconsistent with national guidance. As detailed in previous representations to the JSP consultation stages, TW would argue that it is more appropriate to set out the affordable housing requirement in the four authorities emerging Local Plans, with each authority continuing to set differing affordable housing zones where necessary in order to reflect local circumstances. TW deem this to be more appropriate that the current blanket approach proposed in the JSP.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		TW consider that the levels of affordable housing required on each of the SDLs should be part of the planning balance and should have consideration to other site requirements, such as significant infrastructure, transport improvements and education provision for example. Viability Assessment evidence will be crucially important to ensure that development viability isn't undermined by potentially excessive burdens of on and off site infrastructure, community infrastructure levy (CIL) and affordable housing provision.	
Tom Leimdorfer		Strongly support the move towards 35% affordable housing on sites of 5 dwellings or more. There need to be very tight criteria relating to 'viability' issues so that developers cannot get round the policy requirements. A Land Value Tax (LVT) could deliver a more reliable route to affordable housing.	
Wainhomes		A full review of affordable housing policies is supported.	
Wrighton Parish Council	Wrighton Parish Council	Too often do we hear that, for reasons of profitability, developers seek to reduce levels of affordable housing previously conditioned as part of planning applications approved, which effectively dilutes to required percentage provision. There is a perceived need for more affordable housing which can only be met if the percentage is maintained as set out in the Core Strategy or JSP (if approved).	
Wrighton Village Alliance		The quantity is supported but: There should be clear statements that affordable properties should have this status for perpetuity and should not subsequently lose that protected status Affordable houses in smaller developments should be offered to people truly local to that community instead of District wide personnel.	
wwarden		It is well known that developers have successfully argued against incorporating affordable houses in schemes, or at least reducing the number. This has been on the basis of viability. I don't know if this argument is still allowed but the Plan should specifically require the inclusion of affordable houses in developments, with no viability escape. Clearly, developers should be well aware of the requirement when a planning application is submitted.	

Document Part Name

Q42. Do you have any views on our intended approach to Woodland Neighbourhood

Respondent Name	Respondent Organisation	Comment	Attached documents
Abbots Leigh Parish Council		There is extensive woodland across the NPA much of it designated as wildlife sites. Leigh Woods is an SSSI. These woodlands are highly valued and we emphasise the need - especially in the Green Belt - to minimise development, limit disproportionate size and protect local landscape	

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	<p>The 'woodland neighbourhoods' described are well enclosed, not highly visual and capable of accommodating extensions etc. without significant visual impact. They are also located within Green Belt and contain sensitive ecological environments. For example, there will be bats present and trees that unless subject to a Tree Preservation Order (TPO) can be cleared over time to open out views and space for development. Subject to control over the unnecessary clearance of trees and no adverse ecological effects being demonstrated, we agree that a more relaxed approach would be appropriate.</p> <p>However, if this policy were created then it would be essential to also ensure this policy applied to any property in open countryside, or located in Green Belt where established boundary planting, for example, meant that there were limited if any effects outside of the site being considered. Currently an over-zealous approach is often encountered.</p> <p>It would be entirely inappropriate for such a policy to apply solely to these two locations as any location within North Somerset where mature landscaping limits the external effect of such development should receive the same more relaxed approach.</p>	
Blagdon PC	Blagdon Parish Council	We agree with a more relaxed approach if extensions are still proportionate.	
C Brabner-Evans	Woodland Trust	The Woodland Trust objects to the proposal to relax planning scrutiny that has the potential for allowing tree felling or increased development pressure in woodland areas.	
Chris Butler		All housing should have mandatory renewable energy. Woodlands development should not lead to felling of trees. Why is growth considered good? Housing development, Airport and road expansion = increased pollution not to mention stress = poorer health!! We are becoming Locusts!	
CPRE Avonside	CPRE Avonside, North Somerset District	This approach to Green Belt development appears to ignore the fact that residents with smaller homes are subject to restrictions. Because a house may be secluded and within large grounds it certainly does not mean that a large extension would have little impact on the Green Belt. This proposed policy appears to favour the few and we would question whether this has any equalities impacts?	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	There is extensive woodland across the NPA much of it designated as wildlife sites. Leigh Woods is an SSSI. These woodlands are highly valued and we emphasise the need - especially in the Green Belt - to minimise development, limit disproportionate size and protect local landscape.	
FH		It would be preferable the all properties including extension of woodland community properties are subject to equivalent planning policies.	
Mark Funnell, Planning Adviser, National Trust	National Trust	Regarding the proposed more relaxed approach to large extensions to properties in these neighbourhoods within the Green Belt, the policy approach should still respect the requirement to maintain the openness of the Green Belt. In addition, proposed developments should still be in keeping with the character and appearance of the area. In relation to existing trees, it should be borne in mind that they may not be in place in perpetuity, and could be felled or affected by disease. The views and setting of heritage assets such as Cadbury Camp should be also protected.	
N Cooper	Claverham Future	why bother with such incidental frippery?	

Respondent Name	Respondent Organisation	Comment	Attached documents
Natural England	Natural England	Where Woodland Neighbourhoods are located in consultation bands A to C, as identified in the North Somerset & Mendip Bats Special Area of Conservation (SAC) Guidance on Development SPD, there is potential for even modest development to impact on horseshoe bats, we would therefore expect this to be a consideration, whichever approach is taken forward.	
Peter Burdge	Mr	I agree that a more relaxed approach should be taken to larger extensions in Woodland Neighbourhoods, but only if a more stringent approach is taken to the preservation of existing trees and hedges, so that the extensions have no significant visual impact beyond the plots on which they are situated. There has been a recent tendency to fell trees around such properties, presumably to improve the view from them, but this inevitably means that the properties themselves become more visible and the wooded character of the area is diminished.	
Portishead Town Council	Portishead Town Council	Consider this is not relevant to the Portishead.	
The Belmont Estate	Ridge and Partner LLP	The Estate welcomes a review regarding Woodland Neighbourhoods. It is suggested that such an approach could also be applicable to the Belmont Estate, via policy consideration for new visitor accommodation and enhancing the rural economy in the Green Belt to enable appropriate and sensitive proposals that are synonymous within the open countryside to be bought forward at the Estate.	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	Consider that a relaxation on assessing whether the size of an extension is proportionate in a "Woodland Neighbourhood" is appropriate, provided the development remains under tight control, so not to conflict with erosion of the Green Belt and the Landscape Characterisation. Trees should only be removed or their growth impaired in exceptional circumstances. If the development can be seen from the highway or PRoW, then the proportionality and choice of materials should be a consideration. If an extension is likely to increase the number of highway movements to and from the property on a road with a speed limit greater than 40 mph, then the creation of adequate visibility splays may detract from the rural nature of the road.	
Wrighton Parish Council	Wrighton Parish Council	What is the definition of "a more relaxed approach" and how large is "larger"? Clarify please because it is totally subjective as written and therefore meaningless.	
wwarden		I see no reason for taking 'a more relaxed approach'. Planning policy should be reasonably consistent across the district.	

Document Part Name Q43. Do you have any views on our intended approach to Health Impact Assessments?

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	A HIA policy should provide support for elderly housing including health care (for example a dementia home), sheltered and assisted housing. Given the aging population and extended life expectancy ages, positive planning and allocation of suitable land use in forward plans is now essential.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Blagdon PC	Blagdon Parish Council	We support the concept given our concerns about the impact of increased development on access to healthcare provision by existing communities. HIAs must ensure that facilities and population numbers are adequately matched.	
Bleadon Parish Council		We welcome the clarification of HIA and would suggest that the policy include the requirement for practical actions / mitigations at an early stage of any development rather than being left to the final stages, or not delivered at all.	
Cleeve Parish Council	Cleeve Parish Council	The Health Impact Assessment for the Local Plan 2036 must consider carefully planning applications proposed under the flight path of Bristol Airport. Night flying is detrimental to the quality of well being through sleep disturbance and residents being unable to have windows open in the summer months. Day time noise also affects the quality of life with people seeking areas of tranquillity away from the flight paths. The Chief Medical Officer to the Government, Professor Sally Davies recently published the following report https://www.gov.uk/government/publications/chief-medical-officer-annual-report-2017-health-impacts-of-all-pollution-what-do-we-know . This report states clearly that it is the Local Authorities responsibility to ensure that residents health is not impacted by noise.	
Congresbury Parish Council	Congresbury Parish Council	We welcome this development and expect to be involved on the development of this policy.	
Cresten		HIA s should be required where there are several developments in the same neighbourhood if a threshold size for assessment is being considered. The health impacts of air pollution including particulates from diesel are only now being acknowledged. There are a limited number of test locations for nitrogen dioxide in North Somerset. No2 testing, and testing for particulates, at a larger number of sites is indicated, particularly in neighbourhoods where large developments are taking place.	
Gladman Developments Ltd	Gladman Developments	<p>4.3.26 Gladman are supportive of the Council providing a more informative policy which will provide the additional detail on what type of application and size of development would trigger the need for a Health Impact Assessment (HIA). A HIA is a process which ensures that the effect of development on both health and health inequalities are considered and responded to during the planning process.</p> <p>4.3.27 Gladman would like further information as to what is required by an applicant as part of the HIA process. A standard HIA template would be advantageous for applicants to work with so answers can be more focused on the information and details the Council require.</p> <p>4.3.28 It is Gladman's view that a full HIA should only be required if a significant impact upon the health and wellbeing of the local population from an individual residential development has been identified and evidenced.</p>	
Home Builders Federation Ltd (S Green)	Home Builders Federation Ltd	The NPPG (ID53-004) confirms that a HIA can serve a useful purpose at planning application stage and consultation with the Director of Public Health can establish whether a HIA would be a useful tool for understanding the potential impacts of development proposals will have on wellbeing and existing health services and facilities. However a full HIA should only be required if a significant impact upon the health and wellbeing of the local population from an individual residential development has been identified and evidenced.	

Respondent Name	Respondent Organisation	Comment	Attached documents
J Gower-Crane		What about keeping the existing rural healthy living without the need for development and associated increased pollution?	
jerb44		Building houses close to a proposed major road that is likely to draw increased traffic to Bristol airport and possibly the M4 eastbound, is a health hazard in the making. The light and tyre noise pollution alone will be a major issue.	
Long Ashton Parish Council	Long Ashton Parish Council	HIAs should be considered for smaller developments than "large scale" and should be more rigorous particularly in relation to roads and mineral extraction.	
N Cooper	Claverham Future	All new large scale development must have all necessary facilities health, education, local retail. This must be ensured as part of the first phase of any development.	
Natural England	Natural England	Well connected and high quality GI will be an essential element of planning for healthy living.	
Parish Councils Airport Association	Parish Councils Airport Association	The Health Impact Assessment for the Local Plan 2036 must consider the impacts of ground and air noise from Bristol Airport. Night flying is detrimental to the quality of well being through sleep disturbance and residents being unable to have windows open in the summer months. Day time noise also affects the quality of life with people having to seek areas of tranquillity away from the flight paths. The Chief Medical Officer to the Government, Professor Sally Davies recently published the following report https://www.gov.uk/government/publications/chief-medical-officer-annual-report-2017-health-impacts-of-all-pollution-what-do-we-know . This report states clearly that it is the Local Authorities' responsibility to ensure that residents' health is not impacted by noise as well as air quality. The PCAA expect an independent Impact Health Assessment from North Somerset Council on the impacts of airport expansion at the time of the planning application.	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>The starting point for Health Impact Assessments is that they should be considered in the context of promoting healthy and safe communities as set out in the NPPF. HIA are not referred to in the NPPF and guidance at NPPG ID53-004 says that HIA's 'may be a useful tool to use where there is expected to be significant impact.' However this is again in the context of considering the wider health issues in an area and following consultation with the Director of Public Health.</p> <p>The wider context of the NPPF and NPPG guidance also includes, from the outset, that health and wellbeing and health infrastructure are considered in Local and Neighbourhood Plans. Therefore Local Plans should already have considered the impact of the plans policies and development on the health and wellbeing of the area and set out policies to address any impacts. As such, where a development is in line with policies in the Local Plan, an HIA should not be necessary. Therefore before requiring HIA's for individual proposals, the Council should itself carry out a fully evidenced HIA of the Local Plan itself.</p> <p>We note that the Issues and Options document says that Health Impact Assessments are currently required through Core Strategy policy CS26. However, that policy was formulated prior to the NPPF March 2012 version and we do not consider current NPPF and NPPG guidance justifies a policy which requires submission of an HIA. Therefore if the Local Plan includes a new policy reference to Health Impact Assessments, it should be framed in the context of the current guidance and any reference to an HIA should be on the basis that it may be a useful tool in carrying out an assessment, and then only where there are expected to be significant impacts which have not already been addressed by the Local Plan and its HIA.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Indeed NPPF paragraph 91 sets out the wider context for achieving healthy, inclusive and safe places which promote social interaction, are safe, clear and legible and support healthy lifestyle through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage wellbeing and cycling.</p> <p>In addition NPPG53-002 emphasises that ‘further links to planning and health are found throughout the whole of the NPPF. It identifies key areas including transport, high quality homes, good design, climate change and natural environment. This suggests that health impacts are appropriately addressed in the relevant chapters of an EIA rather than relying on a specific HIA.</p> <p>The NPPG is also clear that Local Authorities are responsible for addressing health issues. In particular ‘<i>the National Plan Policy Framework encourages Local Planning Authorities to engage with relevant organisations when carrying out their planning function</i>’ (NPPG53-002) and ‘<i>Local Authority planners should consider consulting the Director of Public Health on any planning applications</i>’ (NPPG53-004). Therefore it is not appropriate to transfer this responsibility to applicants through the requirement to produce an HRA on individual planning applications, particularly if Health Impact Assessments have not been carried out during the preparation of the Local Plan.</p>	
Portishead Town Council	Portishead Town Council	Welcome the integrated policy towards health impact.	
South West Harp Planning Consortium		It would be useful to include specific guidance in the new Local Plan on what the Council expects to be set out within HIA, and for this to be tailored to scheme size so that this does not become an unnecessarily onerous requirement.	
Stowey Sutton Parish Council		The Health Impact Assessment for the Local Plan 2036 must consider the impacts of ground and air noise from Bristol Airport. Night flying is detrimental to the quality of well being through sleep disturbance and residents being unable to have windows open in the summer months. Day time noise also affects the quality of life with people having to seek areas of tranquillity away from the flight paths. The Chief Medical Officer to the Government, Professor Sally Davies recently published the following report https://www.gov.uk/government/publications/chief-medical-officer-annual-report-2017-health-impacts-of-all-pollution-what-do-we-know . This report states clearly that it is the Local Authorities’ responsibility to ensure that residents’ health is not impacted by noise as well as air quality. Stowey Sutton Parish Council expect an independent Impact Health Assessment from North Somerset Council on the impacts of airport expansion at the time of the planning application.	
Taylor Wimpey - The Vale		<p>Q43. Health Impact Assessments</p> <p>1.39. If any policy is to be developed requiring health impact assessments, it should be proportionate to the size of development proposed, ie an HIA should not be required for small planning applications, particularly where the principle of development is already established through an allocation, unless there is demonstrable potential for a significant (negative) health impact.</p> <p>1.40. Indeed we would urge greater consideration of human health in the selection of the JSPs SDLs. A principal shortcoming of both the proposed Banwell and Churchill SDLs is their remoteness from public transport, services and employment. Active travel and the resultant increase in physical activity is an essential part of improving people’s health and wellbeing, yet both proposed SDLs mentioned above are likely to lead to heavy reliance of the private car as a means of travel, and are unlikely, based on the Council’s own evidence, to be able to provide policy compliant levels of affordable housing; certainly less than can be offered at The Vale.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Taylor Wimpey - Turley Associates	Turley Associates Ltd	Further clarity on when a Health Impact Assessment would be required is welcomed. However, these should only be sought for applications which are genuinely likely to have a significant impact on health and wellbeing.	
Tom Leimdorfer		Strongly support the proposal to have a specific policy on HIAs in order to protect and improve community health.	
WENP	West of England Nature Partnership	We support the proposal of specific policy to better shape HIAs. We recommend that HIAs consider the health and wellbeing opportunities of multi-functional green infrastructure (including access to green space for physical and mental wellbeing as well as water quality and air pollution), as well as potential impacts on GI provision of development.	
wwarden		I support this proposal.	

Document Part Name Q44. Should a new policy aspire to net zero carbon new development?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex		see below	
Alex Child	The Planning Bureau Ltd	If policies are to be pursued that seek to reduce carbon generation, care will have required in its application to retirement housing for older people. Such developments have their own construction and management constraints that may impact on their ability to meet lower thresholds. Viability will also be a factor as a result. The impact of lower carbon generation will be different to that of conventional housing and needs to be considered accordingly.	
Andrew		Yes, or at least a low net carbon impact. The development of a dormitory housing estate and major new road developments at Churchill are wholly at odds with such an aspiration.	
Aston	Aston and Co UK	The starting point for a Replacement Local Plan and recognition of climate change must be a serious consideration of use of Environment Agency data. North Somerset has an out of date Strategic Flood Risk Assessment (SFRA) and the update work currently being commissioned by NSC is limited in scope. The stage 1 and stage 2 NSC SFRA's by Royal Haskoning are now 10 years old. If they are examined in detail, the original documents left unanswered questions and recommendations have been left without any follow up (see Appendix A – Flood Risk Report). We consider that neither the West of England JSP or the NSC Replacement Local Plan can or should be developed without this essential missing data.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Yes, a new policy should aspire to zero carbon new development that is situated within Flood Zone 1 and has no dependency upon flood defences.</p>	
Aston	Aston and Co UK	<p>JSP – Strategic Development Locations: Emissions Analysis – Regen SW</p> <p>Live-Work units have potential to provide immediate benefit in enabling development, promoting economic activity yet reducing commuting and thereby assisting with air quality.</p> <p>The draft West of England JSP seeks to minimise energy demand and maximise renewable energy use where viable and seeks a target of zero carbon construction (that is net zero emissions from regulated and unregulated heat and power).</p> <p>The study found that:</p> <ol style="list-style-type: none"> 1. Large onsite CO2 reductions possible: 2. Onsite CO2 reductions are within currently modelled SDL viability constraints - The 6% uplift is an average of £8,683 per unit for the housing mix tested in this study, considerably more than the £5,886 per unit required to meet the onsite reductions noted in Point 1. <ol style="list-style-type: none"> 1. Allowable Solutions (payments into an “offset” fund for low carbon measures elsewhere in the district) could enable zero carbon to be met within the currently modelled viability constraints. The cost of zero carbon development including Allowable Solutions, as assessed in the 2014 report “The Cost of Zero Carbon” (Zero Carbon Hub), ranges from £2,200 to £7,500 per unit depending on house size and so is also less than the £8,683 per unit average 6% uplift tested in the current SDL viability 2. Third party options could keep costs off the developer’s balance 3. New business models utilising off-site construction, modular systems and performance guarantees may enable net-zero energy homes in the coming years, with drastically lower emissions than current construction methods; for example the Dutch Energiesprong The costs quoted have not been reviewed but it is essential to appreciate these are early cost estimates and the final figure will depend upon the solutions adopted, changing technology and the prices of relevant technology when construction takes place. In the meantime there is Government Commitment to delivering much needed new housing and that requires adequate land identification, assessment and allocation through the plan making process. ESCO models and 3rd party delivery options for energy have future potential but that market is not yet mature and for forward planning to work effectively the entire effect of the proposed land use needs to be properly considered now. That requires identification of the range of energy sources and if this is to use large scale off site, wind, solar etc. where will that be located what environmental effects will that have? 4. All these factors conspire to make the delivery of the SDLs uncertain and long lead. It is therefore essential that NSC review all options at the existing larger settlements, particularly those outside of the flood zone and of limited contribution to the Green Belt. Such land provides the locations where housing development can benefit from existing services and are capable of being delivered swiftly to meet housing need. Planned transport development, the link from the M5 into Portishead and Metro West for example, which will improve accessibility of Bristol from Portishead (expected to be received for examination under the Planning Act 2008 in May-June 2019 by PINS) should also help support more housing at Portishead. 5. A number of the potential solutions, such as wind, are unviable within the District and large scale solar, or district heat systems etc. need suitable land to be identified and reviewed under the local plan process if they are to be part of the solution for the proposed SDLs. All effects for the provision of housing need to be considered – a holistic approach. 6. The REGEN report illustrates exciting industry developments that have potential over the plan period to deliver new development models that support the creation and viability of the proposed SDLs in particular the garden villages. The report also sets out a range of alternative routes to meet the energy need of the new SDLs. 	

Respondent Name	Respondent Organisation	Comment	Attached documents
Avon Wildlife Trust	Avon Wildlife Trust	We would strongly support such a policy. We would recommend that such a policy also considers the role of development in climate change adaptation and resilience.	
Banwell Parish Council	Banwell Parish Council	We agree. New communities such as Banwell Garden Village ideally should have a solar farm attached to it, to provide electricity to the new settlement, but in the absence of this the % in Q45 should be increased. New homes and especially commercial buildings should incorporate greater use of renewable and low carbon technology in the buildings	
Blagdon PC	Blagdon Parish Council	Net zero carbon is an unachievable goal. However, some realistic objectives should be set and enshrined in policies. All developments, whether housing or transport related can be measured against these objectives as part of any formal approval process.	
Bleadon Parish Council		We agree that a new policy should encourage net zero carbon new development.	
Bleadon Parish Council		Should a new policy aspire to net zero carbon new development? We agree that a new policy should encourage net zero carbon new development.	
Cleeve Parish Council	Cleeve Parish Council	CPC believes that all new UK homes should be zero carbon. This target was axed by the Government in 2016 but should be reinstated.	
Congresbury Parish Council	Congresbury Parish Council	Yes – we need to protect the planet and this would be a good policy to develop. We also expect homes to be developed to achieve water use of less than 110 litres per person and ensure sustainable drainage is included.	
Cresten		Yes. Without this aim, building standards and the willingness to train in more sustainable building methods will be lacking. Climate change measures are a priority, and without this the Council is unlikely to meet its reduction target.	

Respondent Name	Respondent Organisation	Comment	Attached documents
D Roy		<p>The concept of an urban village for housing does not fit with the environmental issues of carbon reduction as discussed by the UN currently, IE reducing Carbon emissions by 50% by 2030 in order to maintain global temperature rise to below 1.5C and prevent catastrophic flooding and species extinction globally.</p> <ol style="list-style-type: none"> 1. Carbon reduction of 50% by 2030 will not be met by building roads and houses away from cities where there is increased transport and no current large employers within cycling or walking distance, the plane also, does not include low energy rail links . 2. Electrification of cars will reduce some carbon emissions but with 20% or electricity from renewable sources the plan should be showing a 30% carbon reduction for commuters to be sustainable and comply with un requirements. 3. Bristol council are currently planning a 50% carbon reduction by 2030 4. Bristol airport expansion cannot achieve 50% carbon reduction by 2030 	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	<ul style="list-style-type: none"> • Climate change <p>Sustainability lies at the heart of our Neighbourhood Plan and we have been working with the Centre for Sustainable Energy (CSE) to look at local contributions to tackling climate change and responding to the need for a low carbon approach. We agree that planning policies will need to demonstrate how they contribute to meeting low carbon targets and demonstrate a commitment to reducing emissions, including minimising energy demand through good design, utilising renewable and low carbon forms of energy generation.</p>	
Ecomotive Ltd		<p>Given the critical need to cut carbon emissions, not only from construction and lifetime energy consumption of buildings but also from transport and other infrastructure associated with new and existing developments, the significant role of CLH should not be underestimated. There are some excellent examples of CLH schemes in the UK that have won multiple awards for environmental performance. These include Ashley Vale community self build in Bristol which won Best Housing Project in the Regen SW Energy awards 2009, a Building For Life Silver award in 2010 and Great Neighbourhood 2017 from the Academy of Urbanism, and Lancaster Cohousing, a scheme of 41 homes with community facilities and work spaces, which meets Code for Sustainable Homes Level 6 and won the UK Passiv Haus Trust Award.</p> <p>These kinds of schemes demonstrate that innovation in new housing schemes is possible. It therefore seems logical to set North Somerset's ambitions for sustainability high.</p>	
FH		<p>Insulation of new housing should be inline with current developments in material science.</p>	
Hallam Land Management Ltd (David Lock Assoc)		<p>The proposed policies relating to net zero carbon new development, specific percentage increase in use of renewable energy, and specific percentage decrease in carbon emissions (or off-site mitigative payments) may be overly prescriptive in terms of the application of standards and specific approaches that might be supported to achieve such standards. The NPPF sets out a clear basis (paragraph 150b) for relating local policy to national policy, advocating that local authorities adopt national technical standards. National standards are determined on the basis of rigorous technical and cost information and detailed consultation on such issues that are often complex and site specific.</p> <p>Whilst the LPA might look to innovative ways of achieving the Government's objectives in relation to climate change, any such requirement for a specific standard which is wider than national mandatory standards can only be expressed as an aspiration which must be subject to negotiation in the light of the wider site/ development specific circumstances.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		HLM consider that the requirement for development proposals to have regard to sustainability and environmental considerations is essential, however the application of such measures is directly relevant to development costs and viability implications locally. It is critical that the plan adopts a flexible and pragmatic approach to suit individual circumstances.	
Home Builders Federation Ltd (S Green)	Home Builders Federation Ltd	A new policy should not aspire to net zero carbon new development. Under the 2018 NPPF new development should be planned to help reduce greenhouse gas emissions by its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards (para 150b). The Government has sought to set standards for energy efficiency through the national Building Regulations. The WMS published on 25 March 2015 sought to clarify the regulatory regime. At that time the Government decided to improve energy efficiency for residential buildings through Part L of the Building Regulations. The starting point for the reduction of energy consumption should be an energy hierarchy of energy reduction, energy efficiency, renewable energy and then finally low carbon energy. From the start emphasis should be on a 'fabric first' approach which by improving fabric specification increases thermal efficiency and so reduces heating and electricity usage. Plans should identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers to help increase the use and supply of renewable and low carbon energy and heat (2018 NPPF para 151c). The 2018 NPPF does not stipulate that the Council should be seeking connection to such energy supply systems. Indeed such a requirement is unfair to future consumers by restricting their ability to change energy supplier.	
jerb44		Yes and the best way to do this is to build houses close to the biggest source of employment which is Bristol.	
Kit Stokes	StokesMorgan Planning Ltd	This will create viability issue and again prevent housing from being delivered.	
Long Ashton Parish Council	Long Ashton Parish Council	Yes	
Mark Funnell, Planning Adviser, National Trust	National Trust	National Trust places are and will be affected by climate change, so we would encourage a proactive approach in respect of sustainability in new developments.	
N Cooper	Claverham Future	yes	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	We do not support the reintroduction of the concept of zero carbon for new development. The Government scrapped zero carbon in July 2015 in the Treasury White Paper Fixing the Foundations – Creating a Real Prosperous Nation, which said ' <i>the Government does not intend to proceed with the zero carbon allowable solutions offsetting scheme, or the proposed 2016 increase in onsite energy efficiency standards, but will keep energy efficiency standards under review, recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established</i> ' (paragraph 9.17). Neither does the emerging JCS advocate a zero carbon approach and sets out an <u>aspiration</u> for a new <u>low carbon</u> economy and to minimise energy demand and maximise the use of renewable energy where viable and meeting demand for heat and power without increasing carbon emissions. Until these technical solutions are available and viable it is not appropriate to pursue or require a zero carbon approach through a Local Plan policy.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Portishead Town Council	Portishead Town Council	That climate change should be embedded within the entire strategy of the Local Plan.	
S Ible	Terence ORourke	Gleeson does not consider that a policy aspiring to zero carbon development is justified, and compliant with national policy. Given the level of infrastructure required to deliver the Strategic Allocations, along with affordable housing it's unclear delivery of zero carbon homes is, or will be in the near future viable without significantly compromising the delivery of other required infrastructure and therefore should not be a priority.	
Taylor Wimpey - The Vale		<p>Q44. to Q47. Climate Change</p> <p>1.41. Any changes to policy must be considered in the context of building regulations and national technical standards, and have consideration to the likely impact on the deliverability and viability of development. For residential development, any policy for net zero carbon could have a significant impact on schemes' ability to deliver affordable housing for example.</p> <p>1.42. From a resident's perspective, decentralised energy systems should not be automatically considered the best option. There is currently a lack of regulation in the industry and limiting residents ability to switch suppliers and tariffs can contribute to fuel poverty, particularly for vulnerable households.</p>	
Tom Leimdorfer		Yes, absolutely. We have allowed standards of insulation to stagnate in recent years. Local authorities now have the power the demand higher standards than the national minimum requirements.	
WENP	West of Englnd Nature Partnership	We would strongly support such a policy. We would recommend that such a policy also considers the role of development in climate change adaptation and resilience.	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	Yes but only if Building Regulations are not sufficiently robust.	
Wrighton Parish Council	Wrighton Parish Council	Of course it should!	
Wrighton Village Alliance		Yes - the new policy should encourage and prioritise net zero carbon new development	
wwarden		Yes.	
Document Part Name	Q45. Should a new policy require a significant increase in the use of renewable and low carbon energy generation?		

Respondent Name	Respondent Organisation	Comment	Attached documents
Abbots Leigh Parish Council		Sustainability lies at the heart of our Neighbourhood Plan and we have been working with the Centre for Sustainable Energy (CSE) to look at local contributions to tackling climate change and responding to the need for a low carbon approach. We agree that planning policies will need to demonstrate how they contribute to meeting low carbon targets and demonstrate a commitment to reducing emissions, including minimising energy demand through good design, utilising renewable and low carbon forms of energy generation.	
Alex		see below	
Alex Child	The Planning Bureau Ltd	If policies are to be pursued that seek to reduce carbon generation, care will have required in its application to retirement housing for older people. Such developments have their own construction and management constraints that may impact on their ability to meet lower thresholds. Viability will also be a factor as a result. The impact of lower carbon generation will be different to that of conventional housing and needs to be considered accordingly.	
Aston	Aston and Co UK	Yes, a new policy should require significant increase in the use of renewable energy and it is preferable that such a policy is biased towards local grid connected renewable generation at each development (or very nearby) with battery storage to optimise.	
Avon Wildlife Trust	Avon Wildlife Trust	We support this, in the appropriate places. In the case of solar farms, we would urge the Council to look for opportunities to make use of urban roof space before ecologically or agriculturally important land.	
Banwell Parish Council	Banwell Parish Council	We agree. New communities such as Banwell Garden Village ideally should have a solar farm attached to it, to provide electricity to the new settlement, but in the absence of this the % in Q45 should be increased. New homes and especially commercial buildings should incorporate greater use of renewable and low carbon technology in the buildings	
Blagdon PC	Blagdon Parish Council	Yes. The technologies all exist to provide economic solutions and developers should be encouraged to maximise the installation of these systems.	
Bleadon Parish Council		Should a new policy require a significant increase in the use of renewable and low carbon energy generation? (currently 10% for 1-9 dwellings and 15% for 10 and more dwellings). An increase to 20% and 40% would be preferable.	
Cleeve Parish Council	Cleeve Parish Council	CPC supports a significant increase in the use of renewable and low carbon generation in new developments.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Congresbury Parish Council	Congresbury Parish Council	Yes we would encourage the development of this policy.	
Cresten		Yes. Without more impetus and higher aims we have no hope of achieving sufficient reduction.	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	Sustainability lies at the heart of our Neighbourhood Plan and we have been working with the Centre for Sustainable Energy (CSE) to look at local contributions to tackling climate change and responding to the need for a low carbon approach. We agree that planning policies will need to demonstrate how they contribute to meeting low carbon targets and demonstrate a commitment to reducing emissions, including minimising energy demand through good design, utilising renewable and low carbon forms of energy generation.	
FH		Yes - all new housing developments should use increase renewable and low carbon energy generation to 20%	
Home Builders Federation Ltd (S Green)	Home Builders Federation Ltd	No (see answer to Q44).	
JemB		Solar roof tiles should become mandatory on new developments and extensions (Tesla and others bringing to market 2019) Building of battery oaks to store surplus capacity.	
Long Ashton Parish Council	Long Ashton Parish Council	Yes	
Nailsea Town Council	Nailsea Town Council	Agreed. The masterplan for the town needs to include solar panels/photo voltaic technology and electric vehicle charging points in all new homes.	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	PHSV do not support an increase in the use of renewable and low carbon energy generation. Any local requirements for the sustainability of buildings should reflect the Government guidance on planning for climate change as set out in paragraph 150b of the framework. The Government has sought to set standards for energy efficiency on a national basis through the Building Regulations which is currently maintained at the level of Part L 2013. In addition guidance in NPPF 150b says new development should be planned to help reduce greenhouse gas emissions by its location, orientation and design. Therefore we advocate the starting point for the reduction of energy should be an energy strategy of energy reduction first, followed energy efficiency, then renewable energy and then finally low carbon energy. From the start a fabric first approach should be emphasised, which by improving fabric specification, increases thermal efficiency and reduces both heating and electricity usage.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Portishead Town Council	Portishead Town Council	That this be encouraged in all appropriate locations.	
S Ible	Terence O'Rourke	Gleeson has concerns over the potential to "significantly increase the requirement for the use of renewable and low carbon energy generation" on site. The most economical delivery of renewable and low carbon energy generation may not always be on site and the requirement to deliver on site may significantly compromise the delivery of other required infrastructure. It's not considered any increase in threshold is in accordance with national policy.	
Tom Leimdorfer		Yes, there should be a significant increase in the use of renewable energy generation. However, if dwellings were built to 'passive-house' standards the energy generation requirement should be low anyway.	
WENP	West of England Nature Partnership	We support this, in the appropriate places. In the case of solar farms, we would urge the Council to look for opportunities to make use of urban roof space before ecologically or agriculturally important land.	
Winscombe and Sandford Parish Council	Winscombe and Sandford Parish Council	There should be a requirement for 15% renewable and low carbon energy generation for all dwellings.	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	Yes, particularly for incorporating solar PV in the construction of the buildings and for social and affordable housing.	
Wrighton Parish Council	Wrighton Parish Council	In theory, yes, but await the outcome of the commissioned study in order to inform any change in policy.	
Wrighton Village Alliance		New policy should not aspire to having net energy generation - this has been proved on other development to be inefficient and poor use of resources.	
wwarden		Although worthwhile, without more information it is difficult to see comment in detail on this proposal. The options would appear to be more on-site solar or an obligation to supply power through some off-site or distant green energy system. To offset the power needed there could be a higher standard of insulation specified.	

Document Part Name

Q46. Should the Local Plan identify suitable land for large-scale renewable energy development to support new development?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex		see below	
Aston	Aston and Co UK	Yes, the Local Plan should allocate land for renewable energy development to support each SDL. Solar PV requires 5 acres per MW and this should be encompassed in a development viability assessment. If a Garden Village is to be truly sustainable, it is an essential consideration.	
Banwell Parish Council	Banwell Parish Council	We agree. New communities such as Banwell Garden Village ideally should have a solar farm attached to it, to provide electricity to the new settlement, but in the absence of this the % in Q45 should be increased. New homes and especially commercial buildings should incorporate greater use of renewable and low carbon technology in the buildings	
Blagdon PC	Blagdon Parish Council	It is unlikely that there are many locations within the authority area which would support large-scale renewable projects, and those that do exist have environmental drawbacks or are subject to nimbysm. That said, land should be identified for such schemes and assessments carried out.	
Bleadon Parish Council		It would be preferable to require local and small-scale renewable energy solutions to be designed in to every development.	
Cleeve Parish Council	Cleeve Parish Council	Due to the land available in the North Somerset district which is flooding under SSSI's and AONB there is very little space left for large scale renewable development. We support small scale renewable developments in the right locations.	
Congresbury Parish Council	Congresbury Parish Council	Yes we would encourage the development of this policy but impact on local residents (noise from turbines for example) should be considered.	
Cresten		Yes, but only after all Council owned buildings and car parks have had solar panels and ports installed, and not at the expense of BMV land. All new development should have solar panels or other renewable energy generation.	
J Gower-Crane		Why is land needed when we have roofs?	

Respondent Name	Respondent Organisation	Comment	Attached documents
John Miners		Land within All new developments should incorporate Wind turbines, solar panels and ground source heat pumps so that no additional drain is put on the national grid or natural resources. There is no need for large scale renewable energy development.	
Long Ashton Parish Council	Long Ashton Parish Council	Yes	
Mark Funnell, Planning Adviser, National Trust	National Trust	The National Trust supports an increase in renewable energy generating capacity, but any renewable energy proposals should be of an appropriate scale and location. Consideration should be given to the value and designations of the North Somerset landscape, natural environment and heritage assets before any decision is taken on whether to identify suitable land in specific locations.	
N Cooper	Claverham Future	not just new development, all of North Somerset, it could be a revenue item for NS	
Nailsea Town Council	Nailsea Town Council	Yes.	
Natural England	Natural England	<p>Climate change is widely accepted as the most significant long-term threat facing the natural environment. Increasing use of renewable energy is one of the key steps to help reduce that threat.</p> <p>At the same time, all forms of renewable energy can have negative as well as positive impacts on wildlife, landscapes and people's enjoyment of the environment.</p> <p>The preparation of a new local plan presents an opportunity to identify the places where new energy infrastructure and technologies would be best accommodated, most sustainable and should be encouraged, and those places where the character or features of the natural environment make them less suitable.</p> <p>We are pleased the need for climate change adaptation measures and the role of green infrastructure in delivering these is recognised in the I&O, for example the need for ecological networks to allow species distribution.</p>	
Portishead Town Council	Portishead Town Council	Acknowledge the wide-ranging opportunities with the district and consider that any proposals should be dealt with on its merits.	
R Wood		<p>They should not destroy the Somerset Levels with mass solar panels</p> <p>new builds should incorporate integrated renewable systems making them self sufficient</p>	
Tom Leimdorfer		This should be considered for the strategic development sites (such as Banwell Garden Village)	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	No	

Respondent Name	Respondent Organisation	Comment	Attached documents
Wrington Parish Council	Wrington Parish Council	Yes, but let's not trash Green Belt or AONB or good agricultural land with photovoltaic or solar farms. North Somerset has enough already.	
Wrington Village Alliance		Renewable and low carbon energy generation targets are currently appropriate	
wwarden		No. This could only be through large scale solar installations. These only provide significant power in the right conditions, have significant land use and visual impacts, and the Plan already proposes major impacts on the visual landscape.	

Document Part Name Q47. Where a new policy sets a % reduction in carbon emissions, if it is deemed this cannot be met on-site, should it introduce a mechanism to collect off-site carbon-emission payments?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex		see below	
Alex Child	The Planning Bureau Ltd	Given that it may not be so practicable to provide carbon reducing features to retirement housing developments additional care will be required in application to such a mechanism to retirement housing to ensure that such contributions do not compromise the viability of developments.	
Aston	Aston and Co UK	Yes, carbon reductions should be met at or near the site wherever possible.	
Banwell Parish Council	Banwell Parish Council	We agree. New communities such as Banwell Garden Village ideally should have a solar farm attached to it, to provide electricity to the new settlement, but in the absence of this the % in Q45 should be increased. New homes and especially commercial buildings should incorporate greater use of renewable and low carbon technology in the buildings	
Blagdon PC	Blagdon Parish Council	This would be extremely difficult to measure and police. We feel that achievable targets should be set in the first instance.	
Bleadon Parish Council		Yes	
Cleeve Parish Council	Cleeve Parish Council	CPC support this statement if the mechanism to collect off site carbon emission payments is through a government scheme made available for the public to view.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Congresbury Parish Council	Congresbury Parish Council	Yes we encourage the development of this policy.	
Cresten		Yes, definitely.	
Home Builders Federation Ltd (S Green)	Home Builders Federation Ltd	No (see answer to Q44).	
Long Ashton Parish Council	Long Ashton Parish Council	Yes	
N Cooper	Claverham Future	not payments but a monitored offsite carbon balancing scheme	
Portishead Town Council	Portishead Town Council	Acknowledge the wide-ranging opportunities with the district and consider that any off-site proposals should be verifiable and local, and be dealt with on their merits.	
Simon		This section and questions 44-47 demonstrate that the current document is just concerned with reducing the potential for climate change, but is not facing up to the impact that climate change may bring. Under this heading I should have like to see consideration of the impact of Climate change, though I recognise that potential flooding is discussed in the next section. In terms of reduction in carbon emissions, remember that every resident in the proposed villages who works in or travels to Bristol regularly will have a considerable transport related carbon footprint.	
Winscombe and Sandford Parish Council	Winscombe and Sandford Parish Council	All developers should be made to respect/install the required carbon- emission limits with no let-out clause.	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	No, it is better to have an incentive rather than a punitive measure that has little impact on Climate Change.	
Wrighton Parish Council	Wrighton Parish Council	This will not reduce carbon emissions and will offer a 'cop-out' opportunity to developers to simply pay money over and no doubt increase house prices to factor in this money in order to ensure their own continuing profit margins. Need to rethink this one.	
Wrighton Village Alliance		%reduction - no comments at this stage other than development impacts must include off site transport impacts.	

Respondent Name	Respondent Organisation	Comment	Attached documents
wwarden		Yes.	

Document Part Name Q48. Do you have any views on our intended approach to flood risk?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex Child	The Planning Bureau Ltd	The intended approach that policy will make clear that the development of urban sites within areas benefiting from defences is normally a wider sustainability benefit to the community that outweighs flood risk is supported.	
Aston	Aston and Co UK	<p>The Environment Agency are currently constrained and unable to object to the redevelopment of brownfield land within urban areas provided the flood risk is no worse than previously existed. This is complete nonsense policy. In the ecological world (dealt with under the Environmental Impact Assessment Regulations) we adopt the precautionary approach and play it safe to ensure we don't create irreversible damage of effects on the natural world.</p> <p>It is absolutely essential that any forward plan system fully respects up to date Environment Agency flood risk advice (including effects of climate change). We should under no circumstances continue to build in locations at risk of flood. In all cases, new development should be located in Flood Zone 1 (lowest possible risk) and that decision should prompt us to review any necessary localised changes to the Green Belt where such changes would not undermine the primary purposes of the introduction of the GB (See Appendix A - Green Belt Report).</p> <p>To not apply a precautionary approach to the location of housing and such long term development would be negligent in the extreme. Land and housing provided now must be sustainable and fit for purpose in the long term.</p> <p>At Portishead, development has remediated old industrial land and relies upon tidal defences. The consequences of flooding were less significant when the land was industrial but are more significant now that the land has residential use and in particular where an area of land has recently been consented for elderly sheltered accommodation. Such uses are sensitive to flood and it is essential we no longer continue such patterns of irresponsible land use.</p>	
Aston	Aston and Co UK	Flood risk must remain a primary consideration in directing future development to the lowest risk areas - especially in light of IPCC Special Report on Limiting Global Warming October 2018 and recent world and local events. Surprised and concerned that land outside areas of risk are discounted because of Green Belt but sites in flood zones made it through initial screening process. We have considered extent of Green Belt and included a report. Concerned that current site selection process has failed to take account of JSP Green Belt reviews. Need similar flexible approach in North Somerset to that undertaken at Keynsham - to avoid placing housing in areas of flood risk or unsustainable locations.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Avon Wildlife Trust	Avon Wildlife Trust	We would strongly support the adoption of stronger policy to support in decision making regarding flood risk. In particular, we would urge the Council to encourage the use of upstream thinking and natural flood management as ways of delivering multi-functional green infrastructure to support with reducing flood risk while also providing recreation opportunities, supporting biodiversity and making use of natural processes to help clean water.	
Blagdon PC	Blagdon Parish Council	We have no comments to make.	
Bleadon Parish Council		We support your approach not to encourage development in flood risk areas within the parish of Bleadon.	
Bleadon Parish Council		We support your approach not to encourage development in flood risk areas within the parish of Bleadon.	
C Wilcox		In view of promised global warming, and the already lying water issues in this area who will be held responsible for flooding of new-builds homes. Would owners have redress on the council for allowing the development in such a "threatened" area?	
Congresbury Parish Council	Congresbury Parish Council	We would expect a full review of flood risks, especially with future climate change impacts. While development could happen in higher flood risk areas, any such developments need to be protected by inbuilt measures (such as raising the ground floor level) and assess impacts of flood defences on existing communities so the developments do not make the risk of flooding worse.	
Hallam Land Management Ltd (David Lock Assoc)		<p>HLM strongly support the view of NSC that development in areas benefitting from flood defence is inherently sustainable and of a wide benefit that outweighs flood risk. HLM would also commend any future policy support of the fact that defended land is not at the same risk of flooding as the high risk flood zone it is otherwise categorized within.</p> <p>The Land East of Clevedon benefits from flood defence, and thus HLM consider that the WoE JSP sustainability appraisal process applied unjust weight to Land East of Clevedon's flood zone designation. HLM will be strongly contesting the recently amended WoE JSP sustainability appraisal in the January 2019 consultation and in the eventual plan examination.</p> <p>In respect of Land at Clevedon, technical assessment has been undertaken as part of the preparation of an Outline Flood Risk and Drainage Appraisal (and submitted as part of our representations to the JSP). The assessment work has concluded that a series of practical flood mitigation measures can be implemented to protect the site from flooding and that development will not place an undue risk of exacerbating flooding to adjoining land and, in addition, would deliver Flood Risk and Water Quality betterment as part of the development proposals.</p> <p>HLM have proven expertise and ability to successfully plan and implement development within protected flood zones within the Somerset Levels. HLM have worked closely with the Internal Drainage Board and with Sedgemoor District Council at Bridgwater and at Brue Farm, Highbridge, which both use existing rhyne features as part of a</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		comprehensive site-wide sustainable urban drainage system to deliver a safe development within a protected flood zone, alongside the wider benefits that include water quality betterment and biodiversity enhancement.	
Hayes Family and Mr Cope		<p>5.45 We agree that the redevelopment and regeneration of urban sites and greenfield sites on the edge of Weston-super-Mare, within areas benefiting from flood defences is a wider sustainability benefit that outweighs flood risk. A policy detailing this would benefit decision makers in the Council. However, we question whether such a policy would comply with national guidance and suggest legal advice is taken on this matter.</p> <p>5.46 We have already set out our concerns in respect to the east Clevedon proposals which are also relevant to this question.</p>	
Hoddell Associates (Quinton)	Hoddell Associates	We have over a long period put forward for housing development clients' lands to the south of Clevedon. On page 11 Clevedon is described and the area to the south appears to be excluded on the basis of flood plain issues yet on page 89 it stated that flood defences could result in Clevedon (amongst other towns) contributing significantly to further development needs. In our opinion this would represent a better outcome than the proposed contingency housing site identified in the JSP to the east of M5 J20. We therefore continue to promote the area to the south of the town as having potential for further residential development.	
Hoddell Associates (Quinton)	Hoddell Associates	The new approach proposed by the Council are supported in principle. However, we consider that this approach should also be extended to smaller settlements in order to provide greater options for accommodating non-strategic housing growth.	
J Gower-Crane		Why does tourism accommodation, which may be occupied all year round, appear to have a different development criteria to permanent accommodation?	
John Miners		The existing flood defences in Clevedon include rhyme drainage systems and managed rivers and sluices across Tickenham and Nailsea moor. Consideration of this carefully managed flood defence which drains out to Clevedon needs to be incorporated into highway links and proposed new garden villages around Nailsea. Failure to do this will see a return to the annual flooding of this plain which was remedied in the 1930's.	
Kit Stokes	StokesMorgan Planning Ltd	Support more pragmatic approach provided upper floors are available for refuge during flood event.	
Libbyrich		I believe there should be no further development in flood zones	
Long Ashton Parish Council	Long Ashton Parish Council	<p>Whilst the intended policy may increase available land, the risk of flooding becomes related to the risk that the defences may be breached. That risk is not easily quantified, particularly when climate change uncertainties are considered. The consequences of the defences being breached should be considered and taken into account in granting planning permission. Simple measures such as increasing the height of the ground floor above general ground level should be considered.</p> <p>Flood assessments need to be undertaken on a cumulative basis. SUDs may not be appropriate in all circumstances and a more highly engineered solution may be required.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
M Hayman	.	Flood risk and climate change is and will be very unpredictable over the few next decades. We support the Councils views and recognise the need to protect the larger populated areas. We would not want to see the flood plain areas being reduced to enhance housing developments. Likewise, the regular clearing/cleaning out of drainage dykes/ditches must be maintained.	
Mr C Booy	-	<p>Q48. Flood Risk</p> <p>Currently, and as acknowledged within the consultation document, National policy requires that development located within a high risk of flooding must demonstrate wider sustainability benefits. To date these 'wider benefits' are not defined and not always understood in terms of local benefit. There is an acknowledgement that at present policy does not allow for specific site considerations. As such even if a development has been argued to be possible in light of flood risk allocations that can be mitigated or are untrue, it remains to be deemed contrary to policy. The document goes on to state that the potential approach of relaxing these reigns will not apply past towns and as such would not extend to villages.</p> <p>We contend that whilst this potential change is an improvement, it remains to be inflexible to sites such as the one proposed here. The consultation document questions existing policy in relation to flood defences specifically and it is acknowledged that new flood defences in more rural locations are not a consideration in most instances. However, what this does not allow for is the flexibility to consider sites such as that put forward here, in which it is likely that the flood zone allocation is incorrect and it can be proven that development will not result in increased flood risk elsewhere.</p> <p>In conclusion, the site is extremely suitable for future residential-led development. It should be given due weight in reviewing the Local Plan and in contributing to the evident need for smaller scale housing sites in sustainable locations. Whilst noting the current flood risk context, it seems apparent that the existing flood maps need to be updated, and the site should not be discounted on that basis alone.</p>	Booy site, Portbury, flood rep.pdf (281 KB)
Natural England	Natural England	We would like to see policies that seek to maximise natural solutions that secure multiple benefits for society, for example, using tree planting to moderate heat island effects and SUDS to address flooding.	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>We think it is important to introduce policy guidance for flood risk in a wider sustainability context. It is clear however that any balancing of benefits against risk will have to be undertaken on a case by case basis but we consider that would be better informed by policy guidance which sets out what needs to be considered through a criteria base policy to inform the balances that need to be assessed in any Flood Risk Assessment accompanying a planning application.</p> <p>Having said that, proposals will need to be assessed against other requirements, notably the exception and sequential tests, and the importance of demonstrating the development will be safe from flooding throughout its life without increasing flood risk elsewhere. The NPPF and NPPG set out criteria for when the sequential and exception tests need to be applied, so these do not need to be repeated in any Local Plan policy. However there are other considerations that should be covered.</p> <p>Firstly the policy should support the Spatial Strategy of the Local Plan. Secondly, the policy will need to be evidenced by a plan wide strategic Flood Risk Assessment. Therefore it would be appropriate for the policy to say the sequential test is considered to be passed for proposals located within settlement boundaries and for Local Plan allocations which have been assessed in the SFRA and would be in accordance with the strategy. We note that the Issues and Options document suggest this should be limited to the towns. However since the policy is only intended to apply within settlements there is no reason why it should not be extended to the service villages, which are by definition sustainable locations for new development.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		Where there are sites which are not covered in the context of the SFRA and will need to consider the sequential test, any policy should provide guidance on areas of search for reasonably available alternative sites at lower flood risk and provide guidance on the definition of reasonable alternative sites.	
Portishead Town Council	Portishead Town Council	Very little, if any, development be considered in the flood zone around Portishead.	
Puxton Parish Council	Puxton PC	The last paragraph of this section reads as a rather casual write off of our community – which lies on a key north south route through North Somerset.	
R Wood		The current system of Rhynes & Rivers at Nailsea / Tickenham is carefully managed to avoid flooding we should be mindful not to increase the likelihood of flooding in future years by creating new homes without the infrastructure to cope with demand.	
Simon		There are inland flooding risks from increased runoff from developments, increased rainfall and particularly increased spells of torrential rain that climate change is likely to bring. Dismissing the smaller villages seems to suggest that new larger conurbations are permitted to increase the risk to existing residents through the runoff waters caused by the new developments.	
South West Harp Planning Consortium		We agree that it would be useful to have more guidance in the new Local Plan on how the Council will approach the matter of flood risk and residential development, and consider this in light of the benefits of delivering the urban living agenda. This would significantly assist the Council in prioritising development locations and fast tracking development proposals with limited impacts on flood risk.	
WENP	West of Engln Nature Partnership	We would strongly support the adoption of stronger policy to support in decision making regarding flood risk. In particular, we would urge the Council to encourage the use of multi-functional green infrastructure to support with reducing flood risk while also providing recreation opportunities, supporting biodiversity and making use of natural processes to help clean water. While we understand that it can be challenging to retrofit SuDS where a site is already developed, there is an opportunity to design-in high quality SuDS at the onset of larger development schemes which can provide the abovementioned multiple benefits.	
Wessex Water (Ruth Hall)	Wessex Water	Water and Sewerage Companies are responsible for managing the risks of flooding from water and foul or combined sewer systems providing drainage from buildings and yards. In urban areas, rainwater frequently drains into surface water sewers, or sewers containing both surface and waste water, known as combined sewers. These sewers can be overwhelmed by heavy rainfall, become blocked, or be of inadequate capacity, resulting in flooding of the surrounding area until the water can drain away. The introductory text to question 48 identifies that drainage problems would be a localised reason why relaxing restriction on development would not apply. We request that the LPA consult Wessex Water prior to identifying areas where they consider wider sustainability objectives outweigh flood risk considerations. This will enable us to provide up	

Respondent Name	Respondent Organisation	Comment	Attached documents
		to date information of sewer flood risk. Development proposals in areas where there are known drainage problems should be required to outline a drainage strategy to demonstrate developments can be satisfactory drained.	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	W&F PC support the suggested approach.	
Wrington Parish Council	Wrington Parish Council	No comment, but it is not only urban sites which benefit from tidal flood defences.	
Wrington Village Alliance		Flood Risk - The current policy of permitting development in Tidal (not Fluvial) Flood Zones should be widened so that it is not just urban sites which benefit from tidal flood defences that can be developed, but also villages and other rural areas eg SDLs which similarly are protected by the same sea defences which protect Weston-Super-Mare and Clevedon can also be developed. The Issues and Options document bases its conclusion on the incorrect statement " <i>that smaller settlements are not so high a priority for ... the maintenance and improvement of flood defences</i> ". This is not the case for Tidal defences where it is the same defences that protect both the urban and rural settlements.	
wwarden		<p>In this case, the last sentence in particular is noted and it is therefore expected that land and villages which have experienced flooding in the past, and which are still at risk, will not be appropriate for development, Wrington for example. Also, my impression is that NSC has disregarded the potential impacts of rising sea levels. Any increase in sea levels will increase the local flood risk and it could be that the flood defences referred to will not be adequate.</p> <p>The references to the potential impacts of climate change are minimal, yet the Plan proposes highway and residential development which would probably result in increased traffic movements and related emissions. Climate change will probably result in increased intense rainfall at times and, something which needs to be considered in any coastal area, higher sea levels. This latter point could have a significant impact on North Somerset, not least because it would result in surface water backing up onto the flood plain and surrounding land.</p>	

Document Part Name Q49. Do you have any views on our intended approach to development on previously developed land in the countryside? What type of sites may be suitable for residential redevelopment?

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex		Recent planning decisions show that economic development in the countryside is a challenge; currently, change of use from business to residential is being granted where business opportunities are not being taken up (eg Mill lane, Congresbury). Realistically, using previously developed land for residential needs to take into account that residents will travel to work, and therefore should only be allowed where transport infrastructure exists.	
Andrew		Brown field development should be encouraged.	
Aston	Aston and Co UK	As the promoter of a land parcel (SHLAA Ref: HE18124) adjacent to the settlement boundary in agricultural use with part a former Nursery business, we are particularly familiar with this matter.	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The land is agricultural and part (50% approx.) formerly supported a horticultural nursery and a local shop/garage. The land parcel promoted is adjacent to the settlement boundary and within Green Belt although historically (pre 1972) 50% was outside the GB.</p> <p>Each case should be considered on its merits and evidence supplied by land promoters (and independently tested). To simply deny any development will lead to stagnation and harm rural vitality. Local Plan Policy needs to be flexible enough to review such cases and find beneficial uses including the provision of much needed housing.</p> <p>We supply detailed evidence in Appendix A in support of the case for residential development beneath the 15m contour on the land at Black Rock. GPDO rights have supplied prior approval for buildings of far less substance and age than the former stable at this site. The effect of refusing consent for residential conversion in 1990 has been to discourage any investment and leave a site unattractive and a building with no purpose when starter housing and start-up businesses require affordable small units.</p> <p>We therefore consider that policy should consider each case on its merits but yes residential use of brownfield land should remain an option in appropriate locations. Any site close to the larger settlement boundaries needs to be carefully reviewed whether within GB or not as these are clearly more sustainable locations than a garden village.</p>	
Avon Wildlife Trust	Avon Wildlife Trust	<p>There is an inherent view that previously developed land is of limited ecological value. This is not true and is reflected in the production of the Open Mosaic Habitats on Previously Developed Land description of priority habitats for the UK. We therefore believe that particular ecological scrutiny should be given to proposals to develop on previously developed land.</p>	
Banwell Parish Council	Banwell Parish Council	<p>Whilst the redevelopment of previously developed land is a welcomed principle a general relaxation to allow residential development as proposed could cause problems by further eroding the countryside and we do not support it. However, we do support its use for the provision of economic development and community facilities that are well related to settlements.</p>	
Blagdon PC	Blagdon Parish Council	<p>We support the intention. Obvious sites include hotels, light industrial estates, pubs and clubs.</p>	
Bleadon Parish Council		<p>We do not agree with the principle of extending the policy to include private residential development only. If economic and general community uses have been ruled out, then community-owned options should be offered, which may include limited community-owned residential.</p>	
Christian Leigh	Leigh & Glennie Ltd	<p>The NPPF 2018 does not display a hierarchy for land uses when considering the redevelopment of previously developed land outside settlements. Paragraph 117 supports the 'effective use of land in meeting the need for homes and other uses', and states that policies should make 'as much use as possible of previously-developed or 'brownfield' land'. Paragraph 118 encourages benefits equally on both urban and rural land, and gives substantial weight to using suitable brownfield land within settlements, but also promotes and supports the development of under-utilised land and buildings – without definition of any location.</p> <p>Paragraph 120 recognises that there are changes in the demand for land, and so new uses may come forward. Again, this is not location-specific, and it is clear that such demand will vary in urban and in rural areas.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Paragraph 121 states that 'Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.' There is no requirement in rural areas for this only to be for employment purposes: if there is a need for housing in a rural area, then that is supported by this policy. Indeed, part a) of the paragraph recognises that housing may be a new use, and that it should only be specific key employment sites that are to be protected.</p> <p>The Option put forward by the Council to seek employment or community use runs counter to all the above. It proposes a blanket presumption that previously developed land in rural areas will remain employment, regardless of any consideration of alternative use. The NPPF does not state this: it is only where there are specific key employment sites that there should be a presumption of employment use continuing.</p> <p>The Government supports all development as new uses in the rural area. Housing as a use on rural previously developed land seen equally to employment use. The proposed option for this new policy approach would therefore be contrary to Government policy, and there is no special justification for it. The Policy approach should be to accept redevelopment of previously developed land for all alternative uses, subject to the normal development control criteria.</p>	
Congresbury Parish Council	Congresbury Parish Council	We require further information on this subject before commenting.	
Cresten		All brownfield sites are in principle suitable for residential development.subject to tests for contamination.	
Ecomotive Ltd		We recommend that there should be a presumption in favour of residential development on previously developed land in the countryside, where it is lead by a CLH group and will be placed into long term stewardship by a non profit group that is controlled by community representatives.	
Hayes Family and Mr Cope		We agree that expanding the list of uses would be beneficial to allow previously-developed land in the countryside to be redeveloped for other purposes.	
Hoddell Associates (Quinton)	Hoddell Associates	In our view the principle should be extended to residential development and not purely on the basis of rural housing only once all other uses have been sought and ruled out. Market housing in such locations could prove to be the necessary form of enabling development to bring about wider community benefits when judged in the planning balance.	
J Gower-Crane		Building on these sites should not compromise the aims of the parish with a well defined 'village fence', or the surrounding agricultural practices.	
Kit Stokes	StokesMorgan Planning Ltd	There are many good residential opportunities on PDL in the countryside. The policy should be more supportive.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Long Ashton Parish Council	Long Ashton Parish Council	The use of previously developed land for community facilities is supported. In some cases, and particularly in the green belt, such land, where it was previously used for agriculture should be returned to agricultural use. An example would be where agricultural land in the green belt has been used for sports facilities and these are moved or no longer required. This should not be an opportunity to “manufacture “brown field land in the green belt.	
Mark Funnell, Planning Adviser, National Trust	National Trust	Regarding previously developed land in the countryside, it may be appropriate to include support for community facilities, but only with a strong emphasis on sites being well related to settlements in a way that active travel (walking and cycling) is both possible and an attractive proposition. Residential development seems less appropriate, and any new development in a Green Belt context should be carefully considered.	
Mendip Hills AONB unit	Mendip Hills AONB Partnership	Re p.90, development of previously developed land in the countryside, : Policy considerations should include consideration of the purpose of conserving and enhancing natural beauty in relation to, or affecting land within the Mendip Hills AONB.	
Mr C Booy	-	<p>The policy approach taken to date supports the development of previously developed land in the countryside for economic purposes (as demonstrated on the site a north west of Portbury), but does not have an approach set out for other uses. The principal acceptability of employment sites is expected to remain and as explained above, an element of employment use could take place on the site.</p> <p>The consultation document questions whether this approach should be extended to include residential development on sites adjacent to settlements, where other uses have been ruled out, and where new housing could be sustainable within the surrounding area. We agree with this approach in that it represents a step towards acknowledging that blanket green belt designations are preventing the ability to provide much needed housing development within sustainable locations. It is appreciated that the site is only part developed, however we consider this question to be of relevance to the site.</p> <p>By virtue of the information set out above, the site represents a prime opportunity for residential development given that it would essentially complete an existing village in a sustainable location. As previously explained, the site would also not set a precedent for further expansion, given the strong boundary treatment already apparent.</p>	
Portishead Town Council	Portishead Town Council	This should be encouraged if in sustainable locations.	
WENP	West of Engln Nature Partnership	As above, we support the principle of urban intensification for more sustainable modes of living, but recommend the provision of appropriate policy to enable those who wish to sustainably work on the land, for example as smallholders or in sustainable food production or forestry, to self-build (ref Wales).	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	W&F PC would be supportive of this approach.	
Wrington Parish Council	Wrington Parish Council	What is the definition of “in the countryside”? Does this include Green Belt or would Green Belt sites be regarded separately?	
Wrington Village Alliance		Brown Land. Rural housing on brown field land should be supported even when in the Green Belt. One example is Gatcombe Farm in Wrington.	

Respondent Name	Respondent Organisation	Comment	Attached documents
wwarden		I support this proposal as outlined here.	

Document Part Name Q50. Do you have any views on the conversion of holiday accommodation to residential use in the countryside? What approach should future policies take?

Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	The conversion of holiday accommodation to residential use should be considered case by case based on its merits. There may be locations that are highly unsustainable but others will be close to existing services and facilities and one policy option is to encourage/consent Live-Work units. If an applicant can demonstrate that fibre to the premises is now available, why not consent such use and open the prospect for a use that will not increase commuting and can provide rural economic activity in replacement of holiday accommodation (a business generating use). This provides an excellent solution increasing housing supply (small units) and encouraging business start-up.	
Blagdon PC	Blagdon Parish Council	We support the principle subject to compliance with all planning requirements.	
Bleadon Parish Council		The reuse of isolated rural buildings in the countryside is practical. However, care must be taken to ensure that incremental expansion in the number of buildings in one location does not happen.	
Congresbury Parish Council	Congresbury Parish Council	We require further information on this subject before commenting.	
Grassroots Planning	Grassroots Planning	Q50 (Holiday accommodation in the countryside): We do not comment on the conversion of holiday accommodation to residential use, but consider that future policies should be worded to allow some flexibility for "one-off" hotel uses on land in acceptable locations, where for example it would complement an extension to the airport (as supported by other policies) and therefore help support tourism and the expansion of the airport and the many economic benefits this would bring to the south west. This is in line with the NPPF, which confirms that planning policies should enable sustainable growth and expansion of all types of business in rural area, including through well-designed new buildings and sustainable rural tourism and leisure developments, which respect the character of the countryside.	
Hoddell Associates (Quinton)	Hoddell Associates	In our view there ought to be less restrictive policies applying to the conversion of holiday accommodation to residential use in the countryside in order that such properties can then, on a balanced judgement, contribute to meeting the acknowledged significant housing shortage that currently exists.	
J Gower-Crane		Building on these sites should not compromise the aims of the parish with a well defined 'village fence', or the surrounding agricultural practices	
Kenn Parish Council	Kenn Parish Council	Concern that holiday homes and sites licensed as such are being transformed into areas with permanent housing, with site owners breaking their licence conditions and allowing the properties to become main residences - without the site owner obtaining planning permission or ensuring adequate infrastructure and service provisions are in place.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Long Ashton Parish Council	Long Ashton Parish Council	The current policy should not be changed.	
Portishead Town Council	Portishead Town Council	Such developments should demonstrate that the infrastructure for permanent residents is in place or is planned.	
The Belmont Estate	Ridge and Partner LLP	<p>It is the Estates consideration that proposals for new visitor accommodation in the countryside should be supported in the new Local Plan in line with para 83 of the NPPF which states that planning policies and decisions should enable:</p> <p>a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;</p> <p>b) the development and diversification of agricultural and other land-based rural businesses;</p> <p>c) sustainable rural tourism and leisure developments which respect the character of the countryside; and</p> <p>d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.</p> <p>The Estate is keen to expand as a rural business and tourist offering to enable the enjoyment of its heritage assets for existing and future generations. At present, planning policy is somewhat restrictive of new development under Policy DM57 which takes a less pragmatic approach to new development than the NPPF. The Estate therefore welcomes the opportunity for a full review of this policy to ensure it is suitably flexible and line with the provisions of the NPPF. We would like to discuss this further with Officers as we feel there is an important opportunity to enhance the rural business and tourism offer available at the Estate which will assist in the ongoing maintenance of the Estate and its numerous heritage assets.</p> <p><u>Summary and Conclusion</u></p> <p>Overall, the Estate would like to reiterate its concerns regarding the strategic development locations at Nailsea and Backwell and its associated highway infrastructure requirements. We remain concerned that the development is likely to have a significant and detrimental impact on designated heritage assets and their settings, particularly for the Belmont Estate. We consider that there are more sustainable options available, such as the Vale to meet housing needs without the requirement for such significant new infrastructure.</p> <p>At the same time, the Estate would also like to ensure that policy provision is more flexible moving forward and supports a prosperous rural economy in line with the provisions of the NPPF. It is important that policies of the Local Plan enable the Estate to open its doors to the public for proposals that are synonymous with its countryside location as set out earlier in this letter. Presently Policy DM57 is more restrictive of such proposals but more flexibility will help enable the maintenance and viability of the heritage assets at the Estate for future generations and will also assist in maintaining a prosperous rural economy.</p>	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	The re-use of isolated rural buildings in the countryside should be encouraged for rural and agricultural workers, provided that they are no longer suitable for agricultural use. If buildings are being used for a holiday accommodation, then they are brought to the standards required for residential use as a Condition for change of use.	
Wrighton Parish Council	Wrighton Parish Council	There needs to be control of the scale of "redevelopment" similar to existing policies, but change of use is not an issue provided it does not become inappropriate in terms of bulk and footprint. Sustainability should also be a consideration.	
Wrighton Village Alliance		Holiday Accommodation - this should be tightened up. Already it is common knowledge of holiday accommodation being used as permanent accommodation which is wrong.	

Respondent Name	Respondent Organisation	Comment	Attached documents
wwarden		There was a period when a number of landowners were granted planning permission for building conversion for holiday use. However, it has been alleged that in some cases there was very little holiday use, or even none, and the conversions were used for residential. It would be better to formalise this, consider each site/building on its merits and then, if considered appropriate, grant permission but with clear conditions on use.	

Document Part Name Q51. Do you have any views on our approach to minerals?

Respondent Name	Respondent Organisation	Comment	Attached documents
backwell		Any further expansion of the Stancombe quarry should be denied. Already – there are dreadful scars on this beautiful part of North Somerset. The quarry creates noise and dust and there are substantial lorry movements down the A370. None of the proposed transport plans address this heavy traffic.	
Blagdon PC	Blagdon Parish Council	We have no specific comments although major extensions to current mineral workings would be unwelcome.	
Bleadon Parish Council		We note that DM14 emphasises the need to justify proposed locations for mineral extraction and to have regard for the impacts on humans and the environment. We believe that the statement in DM14 "Proposals should be supported by adequate evidence, to the satisfaction of the council, that the development is needed and justified, and that potential impacts have been satisfactorily investigated and addressed. Proposals must not have unacceptable impacts and should satisfactorily mitigate any adverse impacts" should be strengthened in order to ensure that maximum weight is given to these human and environmental concerns when proposals are considered.	
Bleadon Parish Council		We note that DM14 emphasises the need to justify proposed locations for mineral extraction and to have regard for the impacts on humans and the environment. We believe that the statement in DM14 "Proposals should be supported by adequate evidence, to the satisfaction of the council, that the development is needed and justified, and that potential impacts have been satisfactorily investigated and addressed. Proposals must not have unacceptable impacts and should satisfactorily mitigate any adverse impacts" should be strengthened in order to ensure that maximum weight is given to these human and environmental concerns when proposals are considered.	
Coal Authority	The Coal Authority	<p>I would like to confirm that the Coal Authority does not wish to nominate any sites for inclusion within the assessment.</p> <p>As you will be aware, coal resources are present within the administrative area of North Somerset Council and the area has been subjected to coal mining which will have left a legacy. By way of illustration, within Lichfield there are approximately 170 recorded mine entries and the Coal Authority has in the past been called upon to deal with approximately 20 reported surface hazards.</p> <p>Any eventual site allocation can be assessed against the Coal Authority data that has been provided to you. We are therefore pleased to note that the latest version of this data has been downloaded (18 April and 22 November 2018) by Ms Lauren Dean: GIS Mapping Officer at North Somerset Council.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Notwithstanding the above, I would emphasise that former mining activities and related hazards are certainly not a strict constraint on development; indeed it would be far preferable for appropriate development to take place in order to remove these public liabilities on the general tax payer. The Coal Authority would therefore not wish to suggest that any potential sites should be excluded from the assessment on the grounds of former mining legacy issues.</p> <p>In addition, an assessment should be made of the likely impact on mineral resources, including coal. This will help to ensure that any potential sterilisation effects (along with whether prior extraction of the resource would be appropriate) are properly considered in line with the guidance in paras. 209 and 211 of the NPPF.</p>	
Congresbury Parish Council	Congresbury Parish Council	We require further information on this subject before commenting. The lack of details on possible fracking as well as mineral extraction makes any detailed comments difficult to make.	
Cresten		Local communities should be consulted before any mineral exploitation.	
J Gower-Crane		<p>Prevent mineral extraction for onshore and off shore gas (fracking) in North Somerset, especially on the Bleadon Levels. Why has there been no local information on what this may entail in our communities? Keep the Bleadon settlement boundary and prevent development in the Bleadon and surrounding communities.</p> <p>How does the Local Plan address the immediate fracking issue... e.g. NSC mercury article 19 November 2018 re: NSC Councillors vote to determine local fracking bids, rather than permitted development. Keep the fossil fuels in the ground and prevent CO2 buildup through any subsequent use.</p>	
Julia Hawkins		Say no to fracking! I believe the implications of drilling to obtain oil/gas have not been fully realised and will not benefit any community in North Somerset.	
Long Ashton Parish Council	Long Ashton Parish Council	The overall policy should remain unchanged. However, the local impact must be more effectively monitored and infrastructure strengthened to facilitate the movement of extracted materials. Rigorous HIAs should be required and operations required to be carbon neutral where this is practicable.	
Portishead Town Council	Portishead Town Council	Assume that there will be no proposals or such schemes in or near Portishead.	
Tom Leimdorfer		The existing policy DM14 includes very tight environmental and other criteria for mineral extraction. These should not be relaxed in any way. I would like to see a policy which rules out totally the on-shore extraction of oil and gas (including fracking) as being totally incompatible with the requirement to reduce carbon emissions.	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	Opposed to permitted development rights being used for non-hydraulic fracturing shale gas exploration development ("exploration for fracking").	

Respondent Name	Respondent Organisation	Comment	Attached documents
Wrington Parish Council	Wrington Parish Council	There should be a ban on fracking and on exploratory drilling for shale gas. The government's proposal to allow exploration through permitted development rights is undemocratic, unsupported and unacceptable.	

Document Part Name	Q52. What are your views on our proposed policy approach to electric vehicle charging points?
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Respondent Name	Respondent Organisation	Comment	Attached documents
Aston	Aston and Co UK	We agree policy should now encourage the provision of charging points at home and on larger developments for visitors/community facilities etc.	
Blagdon PC	Blagdon Parish Council	We support a strategy that includes provision for charging points. However, we believe that the percentage of fully operational sites be limited at this time. Whilst plug-in vehicle numbers are increasing, they still represent a very small percentage of total private vehicles and government seems reluctant to promote the concept as it is reducing subsidies. Perhaps subsidies to communities and residents wishing to install charging points should become a local proposition.	
Bleadon Parish Council		We welcome the proposal to include specific standards regarding vehicle charging points both in new homes and in public areas of commercial developments.	
Bleadon Parish Council		We welcome the proposal to include specific standards regarding vehicle charging points both in new homes and in public areas of commercial developments.	
Cleeve Parish Council	Cleeve Parish Council	CPC support the National Infrastructure Assessment July 2018 by the National Infrastructure Commission that Local Authorities should be preparing for 100 per cent electric vehicle sales by 2030. This would include local authorities working with charge point providers to allocate 5 per cent of their parking spaces (including on-street) by 2020 and 20 per cent by 2025 which may be converted to electric vehicle charge points. This should also happen at Bristol Airport.	
Congresbury Parish Council	Congresbury Parish Council	This must be reviewed given the future of all new cars will be electric from 2040's. In developing a new and comprehensive transport strategy, this must be part of that development otherwise it will fail future generations.	
Congresbury Parish Council	Congresbury Parish Council	We would support this development of a new approach and must be included to help protect our future and the local environment which we value.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Cresten		Electric charging points are very necessary. Developers should be required to provide these, Rapid charging points in car parks could provide a source of income.	
Gladman Developments Ltd	Gladman Developments	<p>4.3.29 Gladman consider that before pursuing such a policy requirement, the Council should engage with the main energy suppliers in order to determine the network capacity to accommodate such facilities and identify any potential adverse impacts of a proportion, or all dwellings being required to have an electric charging facility. If charging demand became excessive, there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables and new sub-station infrastructure may be necessary. The cost of such infrastructure may adversely impact on housing delivery. If electric vehicles are to be encouraged by the Government, then a national standardised approach implemented through the Building Regulations would be more appropriate. The Council should await the outcome of the Government's recently announced Department of Transport consultation to be undertaken on this matter which is awaited.</p> <p>4.3.30 There has been a continuing upward trend of electric and hybrid vehicles available to purchase in the UK over the last few years. There are approximately 182,000 'electric vehicles' registered across the UK as of October 2018. As a result of sustained government and private investment, the UK network of EV charging points has increased from a few hundred in 2011 to more than 5,800 charging locations, 9,800 charging devices and 16,700 connectors by June 2018.</p> <p>4.3.31 Any proposed policy should include a requirement on what type of electric vehicle charging point should be provided. There are currently three main EV charger types: 'slow' charging units (3.7kW to 7.4kW) which are best suited for 6-8 hours overnight; 'fast' chargers (7-22kW) which can fully recharge some models in 3-4 hours; and 'rapid' charging units (43-50kW) which are able to provide an 80% charge in around 30 minutes. The fast and rapid charging units would increase costs significantly for a house builder and is a condition that would be too onerous to be provided on any future residential developments. Fast charging circuits are usually required when re-charging mid-journey and are commonly found at motorway service stations. Taking longer to charge a vehicle when at home should be acceptable as the vehicle will be stationary for a longer period of time.</p> <p>4.3.32 Gladman have been involved in a number of public inquiries over the past 12-18 months where electric vehicle charging points have been discussed as part of the conditions session. The use of a 'slow' electric vehicle charging point unit has been agreed between Gladman and various Councils.</p>	
Home Builders Federation Ltd (S Green)	Home Builders Federation Ltd	It is premature for the Council to introduce a requirement for electric vehicle charging points in residential developments. Before pursuing such a policy requirement, the Council should engage with the main energy suppliers in order to determine network capacity to accommodate any adverse impacts if a proportion of dwellings are to have a re-charge facility. If re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables and new sub-station infrastructure may be necessary. The cost of such infrastructure may adversely impact on housing delivery. If electric vehicles are to be encouraged by the Government, then a national standardised approach implemented through the Building Regulations is more appropriate. The Council should be wary of developing its own policy and await the outcome of the Government's proposed future consultation to be undertaken by the Department of Transport.	
Long Ashton Parish Council	Long Ashton Parish Council	Charging points should be considered as part of the essential infrastructure, alongside telephone and broadband internet access.	
M Hayman	.	We support the need for electrical vehicle charging points and the need to plan for future vehicles switching to electric vehicles.	
N Cooper	Claverham Future	make sure the electrical infrastructure can support the load.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Nailsea Town Council	Nailsea Town Council	The policy needs to go further to require the provision of external power outlets accessible from driveways on all relevant new properties.	
Parish Councils Airport Association	Parish Councils Airport Association	The PCAA support the National Infrastructure Assessment July 2018 by the National Infrastructure Commission that Local Authorities should be preparing for 100 per cent electric vehicle sales by 2030. This would include local authorities working with charge point providers to allocate 5 per cent of their parking spaces (including on-street) by 2020 and 20 per cent by 2025 which may be converted to electric vehicle charge points. This should also happen at Bristol Airport.	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>The provision for electric vehicle charging points should be considered as one element of a suite of policies for reducing emissions. Given the still emerging technologies and practices, any policy the Council introduce now should be sufficiently flexible to deal with any changes. Alternatively it may be premature to seek to introduce a policy setting out standards at this time rather than a general 'encouragement' policy which could be supported in the future by subsequent supplementary planning guidance or alternatively through a standard national approach implemented through the Building Regulations given that the detail of provision is a technical issue rather than a planning issue if the government proceed that way.</p> <p>The reference to electric vehicle charging points in NPPF paragraph 105 is one of five factors which should be taken into account if setting local parking standards, the others being accessibility, type mix and use of development, public transport availability and local car ownership levels. Specifically it says policies should take into account '<i>the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.</i>' and '<i>adequate</i>' supply should be assessed against the other factors in paragraph 105 without assessing a need for on point for each parking space.</p> <p>We also note, as set out in '<i>The Road to Zero</i>' strategy (July 2018), that the Government are also keen to encourage the installation of smart charging facilities at every charge point to allow management of demand to off peak periods. It is essential for individual homes to have a smart charging solution, if only to help the local distribution network cope with numerous properties all plugging in at the same time. All of this introduces the need for additional infrastructure and additional costs. Clearly the requirement of provision of electric vehicle charging points could then add substantially to delays in delivery and costs of development.</p> <p>Any new policy, as with all Local Plan Policies need to be deliverable, which in this case will require an assessment relating to the capacity of the local network and availability of infrastructure and costs of provision to meet the likely requirements of users. Therefore before establishing the policy, the Council will need to engage with electricity suppliers to determine the capacity of the network to accommodate electric vehicle charging points and any requirements to reinforce existing cables and sub-stations. Secondly, it is necessary to establish the costs of such infrastructure and take these into account in considering the viability of the plan. Thirdly it is important to ensure charging infrastructure is compatible nationally.</p> <p>In respect of these issues we refer to a Western Power distribution guide entitled '<i>Getting Electric Vehicles Moving</i>'. This explains there are three types of charge points – slow, fast and rapid and that the speed cars can charge is determined by how much electrical power (in kw) the charge point delivers. The expectation is that most consumers will demand rapid charging. Secondly, costs and delivery time are also dependent on the size of the development and number of connections required – small, medium or large. Most housing applications will fall in the large category requiring the provision of multiple fast/rapid charge points where the connection would be six months or more together with a connection cost of £60,000-£2,000,000, together with additional potential street works and legal costs for easements and way leaves and the costs and need for establishing planning permission for sub-stations.</p> <p>The third issue concerns the need to ensure charging point infrastructure is harmonised and the charge points 'talk' to each other. This should be addressed in the Automated Electric Vehicles Act. However until a national strategy is in place there is a danger that much early provision will quickly become redundant either because it is inadequate, not suitable for purpose as electric vehicle s develop or in the wrong place.</p> <p>Nevertheless we recognise Government policy is to deliver a roll-out of public and private electric vehicle charging points. Government policy and technology is still evolving. This dictates that any Local Plan policy at this stage should be flexible not impose requirements that cannot be delivered due to infrastructure or technical issues so we suggest the following:</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<i>'All proposals for new development which include provision of parking spaces should seek to provide electric vehicle charging points, where practical.'</i>	
Portishead Town Council	Portishead Town Council	These should be widely available throughout the district.	
Puxton Parish Council	Puxton PC	We have many businesses along our two mile stretch of the A370 that would provide attractive customer-draws if they installed charging points – particularly if the charging costs were refundable against purchases. It will come – but now the vehicle purchase subsidies are gone, maybe some form of retail inducement to install charging points might emerge?	
South West Harp Planning Consortium		The use of electric vehicles is becoming increasingly common and it is right that the new Local Plan look to address the delivery of electric vehicle charging points. Our experience recently in the South West has not been very positive as the absence of properly researched standards has meant ill-considered requirements being placed on development. Engineers supporting local authorities in the introduction of policies and guidance on this matter have raised specific concerns, noting the significant complications and requirements relating to the provision of charging points which requires 'considerable assessment of existing supplies' and location by competent persons. The advice has been that a dedicated developer's guide and specification should be produced in support of such policy, following a thorough review of all options and clear requirements that relate to the specific challenges of delivery on brownfield and greenfield developments, and the site of development to ensure this properly reflects opportunity and cost. Such a policy should also ensure that while schemes are future proofed for eventual uptake of electric vehicles, this should not prejudice the delivery of affordable housing which remains one of the most critical priorities for the Council	
Stowey Sutton Parish Council		Stowey Sutton Parish Council supports the National Infrastructure Assessment July 2018 by the National Infrastructure Commission that Local Authorities should be preparing for 100 per cent electric vehicle sales by 2030. The expected 5 per cent of parking spaces by 2020 and 20 per cent by 2025 being converted to electric vehicle charge points should also happen at Bristol Airport.	
Taylor Wimpey - The Vale		<p>Q52. Electric Vehicle Charging Points</p> <p>1.43. Whilst we support the principle of seeking to reduce emissions and promote more sustainable forms of transport, it is also necessary to note that there is no prevailing form of technology associated to electric vehicle changing points at present (nor is there likely to be prior to the adoption of the Local Plan).</p> <p>1.44. Therefore we consider that the policy approach should support the principle of their inclusion but leave it to the market to choose whether they should be delivered. This will help to ensure that policy does not endorse a particular technology that may swiftly become obsolete.</p> <p>1.45. Given how high a priority this matter is at a national level, it may be that this is best left out of policy until such a time where national guidance or building regulations on the matter exist.</p>	
Wrighton Parish Council	Wrighton Parish Council	Of course the infrastructure needs to be put in place in order for electric transport to be more widely used.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Wrington Village Alliance		Electric Vehicle Charging - A new policy should be promoted requiring on all residential development the installation to a suitable vehicle charging point location at every house/dedicated car parking space, a cable capable of delivering 7kW. (The charge point should however be installed by the house owner because of the lack of a standard charge point).	
wwarden		It is presumed that the standards referred to relate to new housing development. However, some consideration will also need to be given to charging provisions for existing properties, including those where there might be access issues. For example, I am aware of a house in a terrace where an electric vehicle is charged through a cable taken across the footway. As this is potentially hazardous, especially at night, some agreed design standard is needed for any cable taken across the footway or other public space, whether at height or possibly through a channel or conduit below ground level.	

Document Part Name Q53. What are your views on our proposed approach to Green Infrastructure?

Respondent Name	Respondent Organisation	Comment	Attached documents
Abbots Leigh Parish Council		Our NPA hosts extensive natural assets – Leigh Court (registered historic park), seven unregistered parks/gardens, two Green Flag sites (Abbots Pool and Watchhouse Hill), two local nature reserves, seven wildlife sites, an SSSI, and a long stretch of the Avon/Severn Estuaries. These assets are inter-reliant and we particularly welcome the concept of ecological zones which recognise the interdependence of different elements of landscape and ecology – woodlands and open fields, rock cliffs and water edges.	
Alex		see below	
Aston	Aston and Co UK	A strategic approach on large sites as suggested would be welcomed in principle but is likely to be difficult to coordinate/deliver in practical terms.	
Avon Wildlife Trust	Avon Wildlife Trust	We welcome the JSP's emphasis on the importance of and opportunities provided by green infrastructure networks. We strongly support the Council's proposed approach of a strategic solution that would integrate and thus enhance mitigation across SDLs, that looks to the landscape scale in terms of catchment based water management, habitat creation for wildlife and recreational benefits. We strongly support the proposal to create a broad ecological zone and the acknowledgement of the importance of functional connectivity to enhance ecosystems, as well as broader multiple benefits to society through enhancing recreation, mobility and health. Realising such a vision for highly integrated, strategic GI will require effective integration of GI across multiple departments of the Council. We would welcome discussion on how the Council envisions championing such integration, and how WENP might support to that effect.	
Blagdon PC	Blagdon Parish Council	We support the concept and we expect all developments to comply with the environmental and ecological legislation. Protection of existing green spaces should be the priority before investing resources on new schemes.	
Bleadon Parish Council		The preservation of existing habitats and creation of new ones for a range of species is of high importance. In particular, the creation of species-specific wildlife corridors linking habitats is essential for increased biodiversity.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Bleadon Parish Council		The preservation of existing habitats and creation of new ones for a range of species is of high importance. In particular, the creation of species-specific wildlife corridors linking habitats is essential for increased biodiversity.	
C Brabner-Evans	Woodland Trust	<p>The scale of proposed housing growth and infrastructure development in North Somerset can be a threat to our natural environment but, when well-planned and resourced, can also provide an opportunity to deliver extensive green infrastructure. It is essential that there is an ambitious approach to ensuring every opportunity is taken to achieve 'net gain' for biodiversity through the planning process.</p> <p>We note that a Green Infrastructure Delivery Plan is being developed across the four West of England Authority's to underpin the JSP and we would like to see North Somerset set an ambitious vision for green infrastructure through its Local Plan review process. Any new development should include tree planting as part of the green infrastructure offer. The Local Plan should set out this requirement to provide clarity for developers at the outset.</p> <p>The Woodland Trust believes that trees and woods can deliver a wide range of benefits, and this is strongly supported by current national planning policy. Woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits: - these include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, air quality flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets and supporting agroforestry).</p> <p>Trees & woods can play a significant role in sustaining the landscape scale connectivity that underpins ecological resilience and helps combat climate change effects. The varied and unique habitats woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. This is a particularly important issue in North Somerset given the Bat SACs that are in the area.</p> <p>The Woodland Trust believes that the provision of green infrastructure not only helps to mitigate some of the impacts of development but also provides an opportunity to promote connectivity. At present our trees are under threat from fragmentation of habitats, lack of management, threats from pests and diseases as well as pressures caused by climate change and increased development. The solution based on Lawton in the context of trees, is buffering existing areas of woodland and new planting of trees and hedgerows to create nature corridors for connectivity.</p> <p>Trees in an urban landscape have extensive environmental, health and economic benefits. These include supporting sustainable urban drainage systems, urban cooling and improving the energy efficiency of buildings. Urban trees can reduce air and noise pollution and help reduce wind speeds. They also provide vital nature corridors, linking green spaces through the towns and cities to the countryside beyond. Trees can have a high 'amenity value' bringing beauty and a sense of wellbeing into even our most built up urban centres.</p>	
Cleeve Parish Council	Cleeve Parish Council	<p>It is difficult to respond to this question as the proposed green infrastructure has yet to be made available.</p> <p>There is a possibility that with all the housing development, new road infrastructure proposed and further expansion of Bristol Airport that the green infrastructure proposed will not be sufficient to mitigate the biodiversity loss and harm to the environment. There has to be a recognition that some parts of the plan need to be changed, reduced or not be taken forward. A full and comprehensive understanding of the transport and land use implications is required in order to understand the impacts on residents' quality of life and the local and global environment.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Cresten		Green areas continuous with green corridors are essential if our countryside and wildlife are to be conserved.	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	Our NPA hosts extensive natural assets – Leigh Court (registered historic park), seven unregistered parks/gardens, two Green Flag sites (Abbots Pool and Watchhouse Hill), two local nature reserves, seven wildlife sites, an SSSI, and a long stretch of the Avon/Severn Estuaries. These assets are inter-reliant and we particularly welcome the concept of ecological zones which recognise the interdependence of different elements of landscape and ecology – woodlands and open fields, rock cliffs and water edges.	
Easton-in-Gordano Parish Council	Pill & Easton-in-Gordano Parish Council	<p>1. Green infrastructure</p> <p>Our NRA hosts extensive natural assets – Leigh Court (registered historic park), seven unregistered parks/gardens, two Green Flag sites (Abbots Pool and Watchhouse Hill), two local nature reserves, seven wildlife sites and a long stretch of the Avon/Severn Estuaries. These assets are inter-reliant and we particularly welcome the concept of ecological zones which recognise the interdependence of different elements of landscape and ecology – woodlands and open fields, rock cliffs and water edges.</p>	
Hayes Family and Mr Cope		Whilst we agree with the approach to Green Infrastructure it is important that a thorough review is undertaken of the potential areas to be designated under this policy, to ensure that the land being selected actually does contribute to the purposes of GI and there are incentives to improve the land for ecological purposes. As discussed in previous sections of this statement, we do not agree that the northern parcel of land west of the M5 should be sterilised as Green Infrastructure. Whilst the Grumblepill Rhyne has some ecological benefits there are limited benefits beyond its boundaries.	
J Gower-Crane		Create an ecological zone for Bleadon linking its established key habitats and provide it with its own linked network. Include Bleadon's PROWs, SNCIs, SSSI, wildlife areas, etc. Improve Bleadon's and all members of the public opportunity for leisure, recreation and environmental education.	
Libbyrich		Significant areas of Portishead coastal and flood plain and historic wooden valley sites should be protected and enhanced throughout the planning period. Only areas not covered by such designations should be considered for development.	
Long Ashton Parish Council	Long Ashton Parish Council	<p>This needs to be considered both at a local level and at a wider national level. The creation of a linked network of habitats is consistent with current ecological thinking and needs to be considered as part of an overall strategic plan. Local requirements should be considered.</p> <p>The link between the Avon Gorge and the Mendip Hills is a vital green corridor and must be maintained and where possible expanded. This should be part of a landscape wide environmental policy.</p>	
Mark Funnell, Planning Adviser, National Trust	National Trust	Our response to the Joint Spatial Plan publication document in January 2018 is of relevance and was as follows: "The National Trust was a joint signatory to the letter from four major environmental NGOs that emphasised the importance of green infrastructure in the emerging JSP (15th Sept 2017). The JSP refers to the preparation of a Green Infrastructure Plan, and we would want this to be prepared as soon as possible, to be ambitious in its aims, and to be formally adopted in a way that gives it significant weight and status. The planning system in the West of England needs to be able to support (and deliver) a healthy, more beautiful natural environment". Those comments also apply to the emerging Local Plan.	

Respondent Name	Respondent Organisation	Comment	Attached documents
Mendip Hills AONB unit	Mendip Hills AONB Partnership	We are supportive of the development of an emerging West of England Green Infrastructure Plan and opportunities to link into the wider strategic GI movement networks within AONBs to encourage healthy lifestyles. We would welcome involvement in the development of the emerging document to support access to the Mendip Hills AONB, whilst ensuring that the impact on the inherent sensitivities, special qualities and character of the protected landscape are carefully considered.	
N Cooper	Claverham Future	a good idea.	
Nailsea Town Council	Nailsea Town Council	The principles regarding green infrastructure are supported, but determining the management and maintenance arrangements for these areas must be part of the planning conditions.	
Natural England	Natural England	<p>We advise that there is a need, at this early stage, to obtain sufficient ecological and landscape evidence to inform detailed site allocations and to ensure habitat features that are important for functioning ecological networks are identified and can be protected. It will also be important to identify and quantify habitat losses to inform on and off-site mitigation requirements and to take account of issues such as the time it takes to establish new planting, negotiations with landowners and the like.</p> <p>To underpin the strategic mitigation solution for bats for the SDLs, including associated transport options, we advise that further evidence will need to include habitat mapping supported by bat activity surveys (which are seasonally constrained), focused in areas close to SDLs. We would welcome discussion with the Council as to how this might best be achieved.</p> <p>Similarly, to support the strategic mitigation solutions for mitigating and managing increased recreational pressure on European sites (and SSSIs), there is need for further information to better understand the package of mitigation measures to address this issue and how this will be funded and delivered. There is a strong cross-boundary dimension to increasing recreational pressure on some sites; Avon Gorge Woodlands SAC, for example, illustrates where there is significant benefit (if not a need to) develop the evidence and solutions to address recreational impacts in conjunction with WoE authorities and other relevant organisations and interests.</p> <p>The JSP strategic priority 4 is to secure a 'net gain' for biodiversity, an approach strongly encouraged by the Government's 25 Year Environment Plan and the NPPF, and currently the subject of a Defra consultation that proposes a mandatory obligation for development to deliver net gain. We would therefore expect the North Somerset local plan to include policy for net gain and to set out the options for how that will work.</p> <p>Natural England supports the use of the Defra biodiversity metric as a tool to be used in conjunction with ecological advice to quantify biodiversity net gain in the terrestrial environment. It calculates before and after habitat value in terms of 'biodiversity units'. Natural England encourages the incorporation of the 10 best practice principles developed by CIRIA/CIEEM/IEMA for those delivering biodiversity net gain.</p> <p>Natural England is working to update the Defra biodiversity metric to take account of stakeholder feedback and we plan to release a new version (Defra Biodiversity Metric 2.0) in Spring 2019, accompanied by detailed guidance and a tool to apply the metric.</p> <p>The WoE GI Plan provides an opportunity to establish a shared approach to identifying and resourcing green infrastructure priorities, establishing net gain principles and a suitable mechanism for securing developer contributions and other funding sources.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Natural England	Natural England	We welcome the proposed approach and look forward to working closely with the council and others to prepare and implement the WoE GI Plan. As part of the work on the GI Plan the Council has been involved in developing thinking on developing strong GI policies and ways to integrate GI objectives and implementation into a wider range of local plan policy areas, in recognition of its cross cutting and multifunctional role in achieving sustainable development.	
Parish Councils Airport Association	Parish Councils Airport Association	<p>It is difficult to respond to this question as the proposed green infrastructure has yet to be made available. But a full and comprehensive understanding of the transport and land use implications is required in order to understand the impacts on residents' quality of life and the local and global environment.</p> <p>There is a possibility that, with all the housing development, the proposed new road infrastructure and further expansion of Bristol Airport, the green infrastructure will not be sufficient to mitigate the biodiversity loss and harm to the environment. There has to be a recognition that some parts of the plan need to be changed, reduced or not be taken forward.</p> <p>The PCAA conclude that the JSP to 2036, which covers the same growth period as Bristol Airport's planned growth to 20 mppa, has again failed to mention or take account of any cumulative environmental impacts of development at the airport. The WED 010 Updated Habitats Regulations Assessment and appendices (West of England) published 26 November 2018 does not mention Bristol Airport once. There is an underlying assumption throughout the JSP that the airport will grow, mentioning further growth opportunities through the employment zone and growth outlined in the Joint Transport Plan, with infrastructure improvements justified by an assumption that there will be an increase in air transport movements. North Somerset Council should provide the cumulative environmental impacts of these developments in documents supporting the draft North Somerset Local Plan.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>We note that the Council will need to await the preparation of the JCS Green Infrastructure plan before considering the appropriate approach to Green Infrastructure in the Local Plans. However, it is clear that an approach to environmental and ecological mitigation will need to accord with recent European Court of Justice Rulings. The effect of the People Over Wind, Coillte Teoranta ruling is that appropriate assessment of habitats is required in plan-making and decision-making wherever there is a potential impact on a habitat site, regardless of any mitigation measures proposed. The effect of the ECJ ruling would be to dis-apply the presumption in favour of the sustainable development where sites of suitable mitigation. However, within the current consultation on updates to National Planning Policy and Guidance, the Government are consulting on a change to paragraph 177 of the framework to make it clear the presumption is only supplied where an appropriate assessment shows there is no suitable strategy in place. Therefore policies in the emerging Local Plan should reflect this emerging approach.</p> <p>In addition the government is consulting on establishing a single consistent national approach to treatment of 'net gain' on biodiversity for development sites as part of an overall environmental net gain approach in the planning system in England. Any approach to green infrastructure in the Local Plan should take account of this emerging government guidance and avoid introducing competing demands for additional contribution on housing sites.</p>	
Portishead Town Council	Portishead Town Council	Portishead and its surrounding areas contain considerable environmental assets that must be protected and enhanced over the Local Plan period. These include the RAMSAR designated coastline to the north, SSSIs, SCAs, the wildlife corridor to the east, ancient woodland of Weston Big Wood, and the National Nature Reserve of the Gordano valley.	
Tom Leimdorfer		Strongly support these aspirations. The extension of the Strawberry Line to Clevedon is also a priority,	

Respondent Name	Respondent Organisation	Comment	Attached documents
WENP	West of England Nature Partnership	<p>We support the Council's proposed approach of a strategic solution that would integrate and thus enhance mitigation across SDLs, that looks to the landscape scale in terms of catchment based water management, habitat creation for wildlife and recreational benefits. We strongly support the proposal to create a broad ecological zone and the acknowledgement of the importance of functional connectivity to enhance ecosystems, as well as broader multiple benefits to society through enhancing recreation, mobility and health.</p> <p>However, we note the lack of clearly developed funding mechanisms to enable the delivery (and long term management) of net gains in natural capital. Examples of funding models from elsewhere in the UK that successfully raise developer contributions within a sensitive catchment towards a strategic solution (including SANGs) include Salisbury Plain (wiltshire.gov.uk/guidance-for-developers-hra-mitigation-strategy-salisbury-plainspa.pdf), Ashdown Forest (midsussex.gov.uk/planning-building/protecting-ashdown-forest), the South East Devon European Sites Mitigation Strategy (eastdevon.gov.uk/media/369997/exe-overarching-report-9th-june-2014.pdf) and Dorset Heathlands (bournemouth.gov.uk/planningbuilding/PlanningPolicy/PlanningPolicyFiles/HeathlandSPDOct2015/Dorset-Heathlands-SPD-Oct-2015.pdf). We would urge green infrastructure to be incorporated in the Infrastructure Delivery Plan (pg 29) as an equal component of infrastructure.</p> <p>Realising such a vision for highly integrated, strategic GI will require effective integration of GI across multiple departments of the Council. We would welcome discussion on how the Council envisions championing such integration, and how WENP might support to that effect.</p>	
Wessex Water (Ruth Hall)	Wessex Water	<p>WW support the indicated approach with catchment based water management and where required mitigation to ensure the effective management of surface water at strategic development locations.</p>	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council	<p>In all Strategic Development Locations it is considered important to address the need for mitigation to ensure surface water is effectively managed and the wider ecological impacts. A Natural Capital approach to parks and gardens is acceptable but it may be difficult to apply this to lightly managed green space. However, removal of land from the Green Belt with natural wildlife habitats, particularly in sensitive ecological areas, to enable development, such as to satisfy NTC's Vision, is not coherent. See responses to Q3, Q5 and Q24.</p>	
Wrighton Parish Council	Wrighton Parish Council	<p>Continuing to develop in agricultural and rural areas is already eroding the valued green amenities within North Somerset and providing "green spaces" and "water catchment" areas does not make up for loss of green habitat or agricultural land. Mitigation only reduces the impact on local ecology – it doesn't compensate for its loss forever. We should be looking to <u>enhance</u> our existing and important green ecology, not to mitigate impacts bent on destroying it. It is part of the attraction as to why people wish to live in North Somerset.</p>	
wwarden		<p>I very much support this approach. I'm just a little disappointed that it appears at the end of the document rather than as a more fundamental objective in an opening statement.</p>	
Document Part Name	Q54. Are there any other policy areas you feel need to be considered – either new policies, or amendments to an existing policy?		

Respondent Name	Respondent Organisation	Comment	Attached documents
Alex Child	The Planning Bureau Ltd	<p>THE RETIREMENT HOUSING CONSORTIUM</p> <p>RESPONSE TO CONSULTATION ON THE NORTH SOMERSET ISSUES AND OPTIONS 2036</p> <p>This is a joint representation made on behalf of Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living</p> <p>We are a group of independent and competing housebuilders specialising in sheltered housing for the elderly. Together as a group, we are responsible for delivering circa 90% of England’s specialist owner occupied retirement housing. We hope these submissions will help inform the progress of the Local Plan given the identified significant need for this type of housing, both nationally and locally.</p> <p>The North Somerset Housing Strategy 2016 – 2036 (which therefore runs concurrently with the intended Local Plan advises:</p> <p>The district is home to an above average proportion of older residents (ref: chapter 3). The recently completed Strategic Housing Market Assessment indicates that an additional 4,600 homes specifically for older people with varying levels of support ranging from leasehold schemes for the elderly through to housing for people suffering from dementia will be required over the period 2016–36. Considering this, it will be important that we enable a wider range of housing solutions to allow older people to live independently for as long as they wish.</p> <p>The Strategy and SHMA also identify that most older residents are owner occupiers</p> <p>The requirement for 4,600 homes specifically for older people represents almost 20% of the overall housing requirement over the plan period. However, there is absolutely no reference to this requirement, let alone how to address it in the Paper. The National Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the plan making process. This stipulates that</p> <p><i>The need to provide housing for older people is critical as people are living longer lives and the proportion of older people in the population is increasing The National Planning Policy Framework glossary provides a definition of older people for planning purposes, which recognises their diverse range of needs. This ranges from active people who are approaching retirement to the very frail elderly. The health and lifestyles of older people will differ greatly, as will their housing needs. Strategic policy-making authorities will need to determine in relation to their plan period the needs of people who will be approaching or reaching retirement as well as older people now.</i></p> <p><i>The age profile of the population can be drawn from Census data. Projection of population and households by age group can also be used. Strategic policy-making authorities will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish. Supporting independent living can help to reduce the costs to health and social services, and providing more options for older people to move could also free up houses that are under occupied.</i></p> <p><i>The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra care, registered care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector. Evidence from Joint Strategic Needs Assessments prepared by Health and Wellbeing Boards also provide useful evidence for plan-making authorities.</i></p> <p>The White Paper recently published ‘<i>Housing White Paper: Fixing our Broken Housing Market</i>’ clearly signals that greater consideration must be given to meeting the needs of older persons’ in Local Plans stipulating that</p> <p><i>‘Offering older people, a better choice of accommodation can help them to live independently for longer and help reduce costs to the social care and health systems. We have already put in place a framework linking planning policy and building regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing, the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the</i></p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p><i>Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people. Guidance produced under this duty will place clearer expectations about planning to meet the needs of older people, including supporting the development of such homes near local services.</i> (Para 4.42) (My emphasis).</p> <p>It is therefore clear that the provision of adequate support and accommodation for the increasingly ageing demographic profile of the District is a significant challenge and, unless properly planned for, there is likely to be a serious shortfall in specialist accommodation for the older population, which will have a knock-on effect in meeting the housing needs of the whole area and wider policy objectives. Specialist accommodation for the elderly, such as that provided by McCarthy and Stone, will therefore have a vital role in meeting the areas housing needs.</p> <p>We consider that the best approach towards meeting the diverse housing needs of older people is by having clear and specific policies that encourage the delivery of specialist forms of accommodation such as sheltered / retirement housing and Extra Care accommodation. This is an expectation of the NPPG and possibly the subject of further legislation through the White Paper and in areas of similar demographics and housing needs, many Development Plan documents already do this.</p> <p>When selecting sites for elderly persons' accommodation careful consideration is given to locational criteria including: Topography, Environment (including safety and security), Mobility, Services and Community Facilities. As such, suitable sites for specialist accommodation for the elderly are difficult to find and tend to be located within, or adjacent to town or local centres. It is therefore highly unlikely that the majority of development sites will be suitable for specialist accommodation for the elderly, particularly on urban extension sites where access to goods and services may be limited.</p> <p>Specialist accommodation for the elderly also usually provides an element of care and communal facilities at an additional cost to the developer. This requires a critical mass of residents to be feasible and small scale developments of specialist housing for the elderly could not be realistically asked to provide or maintain such facilities. It is therefore unlikely to expect the provision of specialist accommodation for the elderly to be met piecemeal in general needs housing developments.</p> <p>The NPPG guidance recognises that "<i>Supporting independent living can help to reduce the costs to health and social services</i>". This is because such developments generally bring about considerable social and health well being benefits to its residents. This is particularly the case with forms of Extra Care housing which brings with it many health, social and well being benefits. Extra Care promotes independent living but with care readily available to help people remain in their own home environment. This approach also fully accords with the changed emphasis of government in the Care Act 2014 which seeks to transform the provision of adult social care with a new emphasis on wellbeing, prevention & integration. The concept of 'independent living' is a core part of the wellbeing principle and housing is specifically included in the key definitions of wellbeing and is extensively referenced in the Statutory Guidance. Housing is recognised as a 'health-related service'. Prevention is central to the vision of the Care Act with a clear obligation for the new care and support system rather than only intervening when people reach a crisis point. Extra Care delivers in all these regards.</p> <p>The Public Sector is ahead in the delivery of Extra Care Housing and in many cases can call upon support to do so. Given the tenure structure of the district though with most residents being owner occupiers and the older population particularly so, there is considerable unmet demand for private sector Extra Care Housing. Its delivery though faces a number of challenges in finding suitable sites and delivering schemes. The direction of the West of England Plan and the Council's previously published SPD in this respect is very much towards ensuring that Extra Care schemes are also required to provide affordable housing. Given the difficulties in delivery of private sector Extra Care housing in any case and the relative ability of the public sector to do so, the Local Plan should take the opportunity to reassess this approach.</p>	
Aston	Aston and Co UK	<p>Education land for mainstream and special education needs should be identified and land allocated. For example, there is an acute need for additional special education needs development in North Somerset (see here).</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Live-Work units need a stand-alone policy and should be encouraged. Such development would underpin sustainable living patterns and provide opportunities to support and maintain rural vitality.</p> <p>Care Homes – dementia care, general elderly care and assisted living together with retirement villages are now essential and the market demand will increase due to the UK's aging population profile. A specific policy should address this matter and suitable land needs to be identified and allocated.</p>	
Blagdon PC	Blagdon Parish Council	We have no suggestions to add.	
Bleadon Parish Council		The ecology of the water and wetland environments in Bleadon (and across North Somerset) is precious and vulnerable. A more joined-up approach to development involving water courses is essential. Consultation with the Internal Drainage Board and the Wildlife Trust should be mandatory for any development (including caravan parks and recreational facilities) within a wetland area.	
C Brabner-Evans	Woodland Trust	<p>The Woodland Trust believes that, in the context of high levels of proposed housing and infrastructure growth, it is essential to protect our existing woods and trees, particularly irreplaceable ancient woodland, aged and veteran trees. It is also an opportunity to increase canopy cover by integrating trees into new developments and creating new woodlands as part of the green infrastructure offer.</p> <p>These issues are particularly significant in North Somerset which has areas of ancient woodland and ancient and veteran trees outside woods, home to key species such as greater and lesser horseshoe bats. Any loss or damage to these irreplaceable habitats would devastate the wildlife that depends on them. There would be significant benefits from woodland creation to extend, buffer and protect habitats and to promote biodiversity and connectivity.</p> <p>We would welcome much greater emphasis in the North Somerset Local Plan on the importance of protecting and enhancing the natural environment.</p>	
C Brabner-Evans	Woodland Trust	<p>The Woodland Trust would like to see specific commitments to the protection of ancient woodland and ancient and veteran trees as well as commitments to enhance these species rich environments.</p> <p>Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since at least 1600 AD. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost.</p> <p>The recent review of the NPPF gives ancient woodland and ancient and veteran trees outside of woods the highest possible level of protection from development, exceptional only, which puts it on a par with the historic environment. We would like to see this clearly referenced within the plan.</p> <p>Further we would welcome a broad commitment to protect and enhance trees, hedgerows, woodland, field boundaries and wildlife corridors. Where possible these features should be retained and where it is not possible a robust replacement standard should be set.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
Cleeve Parish Council	Cleeve Parish Council	All policies contained in the Local Plan should be considered in how they meet and are consistent with the fifth carbon budget 2028 – 2032 which has been set by the UK government.	
CLH Pipeline System Ltd	CLH Pipeline System Ltd	Thank you for your email to CLH Pipeline System Ltd dated 7 December 2018 regarding the above. Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to www.linerearchbeforeudig.co.uk , our free online enquiry service.	PEANNING_plan.pdf (1.4 MB)
Coal Authority	The Coal Authority	<p><u>Surface Coal Resources and Prior Extraction</u></p> <p>As you will be aware, the North Somerset Council area contains some coal resources which are capable of extraction by surface mining operations.</p> <p>The Coal Authority seeks to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking consideration of prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.</p> <p><u>Coal Mining Legacy</u></p> <p>As you will be aware, the North Somerset Council area has been subject to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.</p> <p>Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface, including existing residential areas.</p> <p>The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas need to take account of coal mining legacy issues.</p> <p>Within the North Somerset Council area there are approximately 172 recorded mine entries and around 4 coal mining related hazards have been reported to The Coal Authority. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards.</p> <p>Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.</p> <p>As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.</p> <p><u>Comments on the North Somerset Local Plan 2036 – Issues and Options Consultation</u></p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The Coal Authority provides the LPA with downloadable GIS information in relation to Development Risk and Surface Coal Resource plans. The Coal Authority would expect the LPA to review this information when considering sites for future allocation in order to identify any potential risks which may be present on the site, and may impact on the quantum of development which can be accommodated on it, early in the process.</p> <p>The Coal Authority has no specific comments to make at this Issues and Options stage. However, we do wish to be consulted both informally if required and formally on future stages of the Local Plan.</p>	
Congresbury Parish Council	Congresbury Parish Council	<p>Overall, most of our points about settlement boundaries, affordable housings, flood risk have been covered in this response. However the biggest issue that has not been outlined in this consultation is the lack of a co-ordinated and truly future transport plan. Without this, all other aspects of the plan are at risk. We have big expectations for North Somerset Council to face the future problems now and not leave it to future generations to sort out when it is too late. This will also require co-ordination with health, education, police and fire services to ensure North Somerset Council truly develops a sustainable local plan for the future.</p>	
Cresten		<p>1. Making space in new housing or commercial developments, or at the roadside, for trees and undergrowth for wildlife, against pollution, flooding, and to provide shelter and shade, is becoming increasingly important. However, when older properties are renovated, driveways are often tarmacked or block paved, and hedges ripped out and fences put up. A policy aimed at preventing this is indicated.</p> <p>2. An improved and enlarged Consultation Policy is indicated. Engaging individuals and communities in planning matters at an earlier stage, including pre-application advice, and short consultations through social media as issues arise would be welcome.</p> <p>3. Empty homes. The approach needs to be in line with the WECA authorities.</p>	
Ecomotive Ltd		<p>We suggest the establishment of a new policy on Community-Led Housing, recognising the multiple benefits that CLH can bring to an area and setting out mechanisms through which CLH will be supported and encouraged within North Somerset. There are likely to be strong synergies between this policy and the existing/revised policies on Self Build and Affordable Housing, but it is probably best to have CLH as a standalone policy in order to recognise its unique features and contribution.</p> <p>i. Benefits for local authorities</p> <ul style="list-style-type: none"> ● Gathering and securing public support for new homes and regeneration projects ● Delivery of affordable homes in perpetuity ● A mechanism for meeting local authority duties to provide self-build and custom build plots ● Diversifying housing providers ● Potential to address small sites, problem/stuck sites, unattractive sites, contentious sites ● Reducing reliance on public services, by for example addressing social care through building communities with mutual support for the elderly and vulnerable, involving homeless people in the renovation of homes, the provision of activities and services = developing mutually supportive communities ● Building resilient communities that can support and look after one another 	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> ● A higher environmental standard than is usually delivered through developer-led schemes, helping to meet local and national targets for CO2 reduction, biodiversity, etc. ● Economic regeneration of rural communities through bringing more young people into the area and through creating mixed-use developments that provide opportunities for local employment, including land-based livelihoods ● Using the ability of community groups to access additional funding for development ● Ability to address specific housing needs of specific groups ● Ability to enable denser development through a collective approach and shared communal space ● CLH ability to harness positive attitude to development, energy, urgency, skills and access to finance ● Addressing homelessness and rising costs for the council <p>ii. Benefits for individuals and communities</p> <ul style="list-style-type: none"> ● CLH can build exemplar homes of high quality design including high environmental standards, disability access - really meeting the needs of the residents ● Ability to access affordable homes ● Ability to shape what happens in the neighbourhood ● Raises design and build quality for individual homes and the wider neighbourhood ● Gain new skills, training and jobs ● Builds more cohesive communities through a shared endeavour ● Builds assets for groups to achieve greater financial viability and less dependence on grants ● Communities are able to build assets and take a long-term stewardship role ● Community groups and their residents able to provide mutual support, reducing reliance on social care ● Future income streams able to help deliver activities and services to more vulnerable community members (e.g. older people, young people) ● Communities able to generate their own income streams ● More opportunities to work near the home, reducing time, cost and environmental impacts of commuting 	

Respondent Name	Respondent Organisation	Comment	Attached documents
Environment Agency	Environment Agency	<p>We would like to suggest that reference is made to working with the Environment Agency who have the Strategic Overview of Flooding under the Flood and Water Management Act.</p> <p>The Environment Agency, Coast Protection Authorities and other Risk management Authorities plan for flood and coastal erosion risk into the future. We create strategies to help us manage current and future risks and these strategies will take account of climate change implications. The coming years (up to 2036) will see the potential need to consider flood and coastal erosion risk issues along the North Somerset Coastline between Weston super Mare and Clevedon. We welcome the opportunity to work in a more integrated way with the council on future flood risk projects and strategies relating to risk reduction and the growth agenda.</p> <p>We would like to provide a more detailed suggested approach to integrated catchment management, spatial planning, planning policy and future projects in time for the next phase of this consultation.</p>	
Environment Agency	Environment Agency	<p>We would welcome the opportunity to discuss the inclusion of policies that propose for including contributions to flood defence upgrades within the plan period for certain areas, including Sand Bay, Kingston Seymour/Woodspring Bay (including the Congresbury Yeo Tidal Banks). We are currently undertaking a model to understand the impacts of climate change along the coastal frontage between Woodspring and Clevedon. Within this plan period defences at Weston super Mare may also need raising by the council. This would also apply to many areas along the coast/tidal areas where we know future improvements are required due to climate change and ageing assets.</p>	
Environment Agency	Environment Agency	<p>The dominant bedrock geology in the area is Mercia mudstone which is classified as secondary B aquifer although this overlies limestone's that are classified as principal aquifers. These are regionally important for providing groundwater resources for public water supply, industry and agriculture. The limestone is exposed at the surface in some parts of the area which makes it highly vulnerable to contamination from polluting activities. We would therefore recommend that any land uses with planned or potential discharge of pollutants to ground are located away from these sensitive areas.</p> <p>There are a number of groundwater abstractions in the area covered by the Local Plan and these should be protected, along with the wider groundwater resource. Specific areas around public water supply sources are delineated for special protection and designated as Source Protection Zones. The extent of these are shown on the DEFRA Magic mapping website: https://magic.defra.gov.uk.</p> <p>More information, advice and guidance on groundwater protection, including consideration of Source Protection Zones and the types of development that may or may not be appropriate in certain areas can be obtained from our website: https://www.gov.uk/government/collections/groundwater-protection.</p> <p>We support the redevelopment of brownfield land and the opportunity this provides for managing historic contamination to minimise risks to controlled waters. Where there is the potential for land to be affected by contamination we recommend that developers should:</p> <ol style="list-style-type: none"> 1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination. 2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. 3. Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed. 4. Refer to the contaminated land pages on GOV.UK for more information. 	
Environment Agency	Environment Agency	<p>It is important that all new road schemes and improvements to existing roads take the needs of otters into account in their design and construction, which should help reduce the number of otter road casualties. Mitigation may involve construction of an open span bridge, otter underpass, otter ledge or fencing, etc. For further guidance please</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>view the Highways Agency's "Design Manual for Roads and Bridges, Volume 10 Environmental Design and Management Section 4 Nature Conservation, Part 4 Ha 81/99 Nature Conservation Advice In Relation To Otters" see: http://www.standardsforhighways.co.uk/dmrb/vol10/section4/ha8199.pdf</p> <p>Somerset Otter Group have mapped where dead otters have been found in Somerset (http://www.somersetottergroup.org.uk/archives/2725), North Somerset Otter Group would also be a valuable source of information for dead otter locations in North Somerset which could be used to inform and plan appropriate otter mitigation.</p> <p>RAMs (reasonable avoidance measures) and mitigation measures are required for amphibians, reptiles and nesting birds when infilling wet areas/channels, carrying out earthworks or any vegetation clearance. This includes tall herbaceous riparian growth favoured by species such as Sedge Warblers, and overhanging/floating vegetation favoured by water birds. Measures may include survey, avoiding sensitive times, displacement, pre-works search & site clearance. This is to protect species of principal importance under S41 of the NERC Act (2006).</p> <p>Non-native invasive plant species - It is an offence to cause plant species listed in Schedule 9 of the WCA (1981) to grow or spread in the wild. The presence of these species within any working area may require an INNS management plan. Timescales for control/eradication depend on the scale of the problem and the method used. Herbicide treatment and small scale physical treatment may be required over 3 or more years.</p> <p>Consultation on designated sites which may be affected by the proposals should be undertaken with the relevant statutory bodies.</p> <p>Lighting has been shown to have an impact on wildlife including birds, bats and other mammals. Increased infrastructure should be designed with these potential impacts in mind. Several important designated sites in North Somerset including North Somerset and Mendip Bats SAC should be carefully considered to reduce the impact of Section 41 species foraging and commuting within the wider landscape. Riparian corridors should retain appropriate buffer zones and avoid increased light spill.</p>	
Environment Agency	Environment Agency	<p>Following an Asset Management Planning 6 investigation, there is a proposal as part of the Wessex Water Water Industry Natural Environment Programme (WINEP) to deliver a wetland solution to the Wessex Water-owned surface water outfall (SWO) at The Causeway, Nailsea, which discharges to Tickenham, Nailsea and Kenn SSSI. Whilst Wessex Water own the SWO, the company is not responsible for the quality of the effluent, as it is not subject to a permit. In summary, the SWO was confirmed as contributing a continuous, but intermittently high flow of water, containing anthropogenic-sourced chemicals directly into the SSSI.</p> <p>The report recommended that:</p> <ul style="list-style-type: none"> • An end of pipe solution (retention pond/wetland) is the only cost-effective measure to reduce the base level of total phosphorus and storm discharges. • The option should have some treatment (i.e. SuDS at high risk areas) within Nailsea to manage total loads into the feature to ensure the biodiversity and amenity benefits are not comprised (i.e. the build-up of pollutants is not faster than the rate of natural breakdown). • The above be implemented alongside measures to address misconnections and foul sewer network blockages, sympathetic ditch management practices and continued water quality monitoring. <p>As well as the proposed partnership delivery of a wetland solution, we would also expect Sustainable Drainage measures (SUDs) to further address existing and future drainage and development pressures in the area.</p> <p>All foul drainage should be directed to mains sewers in the first instance. Only if mains sewerage is unavailable should other methods of foul disposal be considered.</p>	
Environment Agency	Environment Agency	<p>The first action in the 25 Year Environment Plan is to embed an 'environmental net gain' principle for development including housing:</p> <p><i>"We want to establish strategic, flexible and locally tailored approaches that recognise the relationship between the quality of the environment and development. That will enable us to achieve measurable improvements for the environment – 'environmental net gains' – while ensuring economic growth and reducing costs, complexity and delays for developers"</i></p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		This Local Plan includes the 25 year plan within its evidence base and therefore an appropriate mechanism should identify and ensure delivery of an ENG approach.	
FCC Environment Ltd	Sirius Group	Chapter 9 of the Issues and Options Document refers to the potential new policy areas that are needed in the new Local Plan. It states that the adopted policies in the Development Management Policies Plan, adopted in July 2016, are generally up-to-date and can be carried forward into the Local Plan 2036. Policy DM57 of the adopted Development Management Policies Plan relates to conversions, reuse and new build for visitor accommodation in the countryside. The adopted policy states that "...the construction of a new building for use as visitor accommodation will be permitted provided that it ... is set within the curtilage of an Page 3 of 3 existing building and is located adjacent to that building...". FCC consider this adopted policy is overly restrictive; a less restrictive approach, whereby the merits of each case is considered individually, would support greater enhancement of leisure and recreation facilities which would contribute to the rural economy. Paragraph 83 of the NPPF states the "planning policies and decisions should enable: ... c) sustainable rural tourism and leisure developments which respect the character of the countryside...". The policy should be updated and broadened to enable the benefits that the scheme would generate for the rural economy to be considered and weighed against any impact.	
GVA Grimley	GVA Grimley	<p>Strategic Gaps</p> <p>St Modwen seeks a review of the Strategic Gaps policy given the significant area of North Somerset that is covered. Concerns were raised at the Site Allocations Part 2 Examination in Public with regards to the robustness of the evidence base supporting the proposals and we would wish to see a further review. The St Modwen former Moss land extension site at Locking (SHLAA reference HE1832) has been discounted in the SHLAA on the basis of falling within the designation despite it being in a sustainable location (in the centre of the Weston Villages) and adjacent to future development. The site could make a significant contribution to the identified housing requirement within Weston.</p> <p>Protection of employment sites</p> <p>As we have noted above (Employment) we would wish to see a robust and commercially evidenced review of the employment allocations being carried forward as the Atkins Employment Land Review cannot be relied upon for this purpose.</p>	
Historic England (R Torkildsen)	Historic England	<p>On 10 January 2018 we provided detailed comments at the <i>generating ideas</i> stage (attached), and it would be very helpful to appreciate how the intervening 'plan making' has considered the matters raised.</p> <p>Our recommendations included the preparation of a Heritage Topic Paper setting out the Issues, opportunities, risks and challenges facing North Somerset's historic environment and how an appropriate response could provide a positive, proactive strategy for the conservation of the historic environment, including assets most at risk, in accordance with the expectation of the NPPF.</p> <p>The comments made in January 2018 in relation to the strategic allocations and infrastructure still apply and the demonstration of a robust historic environment assessment of the options, and how development could positively respond will be vital. We recognise that the potential future impact of development on the significance of affected heritage assets has clearly been considered but it is unclear where this evidence is that shows how the assessment has been undertaken.</p> <p>Historic England has prepared advice to local authorities on how to efficiently consider heritage assets and their setting in the preparation of local plans, and the identification of suitable allocations. I hope this may be helpful.</p> <p>https://historicengland.org.uk/advice/planning/plan-making/</p> <p>Perhaps a meeting in the new year to discuss the above would be useful.</p>	<p>NS Generating ideas Jan 2018 HE RT.doc (85 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
K Waterman	Avon & Somerset Constabulary	<p>The expected remainder of the delivery of new homes propose developments widely ranging in size and type, throughout the North Somerset area and will require continued consultation between North Somerset Planners and Avon and Somerset Constabulary (CPDA) to ensure appropriate designing out crime measures are incorporated at the earliest possible stages.</p> <p>Core Strategy</p> <p>CS15: Mixed and balanced communities Policy 3.213 & 3.214 should be retained to reinforce the requirement to consult with A&S Police regarding new planning proposals.</p> <p>It would be an opportunity to develop an updated 'designing out crime' protocol between NSC planning department and Avon and Somerset Constabulary as to the category of development requiring consultation with the Crime Prevention Design Advisor.</p> <p>CS12: Achieving high quality design and place- making - refers to designing out crime, and high quality design standards to be delivered in development proposals and specifically attaining Secured by Design (SBD) accreditation (policy no 3.169) I would request these references are retained in any updated Local Plan.</p> <p>SBD</p> <p>The Secured by Design Award has been expanded to include Gold, Silver and Bronze levels. In order to achieve the Gold Award, the property has to achieve the requirements of Approved Document Q and also show that the development layout and some ancillary security requirements, such as lighting and cycle storage, have been met. The Silver Award fully discharges the requirements of Approved Document Q and, in addition, requires certification from independent third-party certification bodies. Secured by Design Bronze is primarily for the refurbishment market but, where issued in respect of a new home with 'bespoke' products, it can also satisfy the requirements of Approved Document Q.</p>	
Local Access Forum	Local Access Forum	<p>The main thrust of the LAF's argument is that ALL the new walking/cycle paths which are mentioned in the document should become multi-user paths as defined above. Making multi-user access a specific requirement for all new land development gives NSC a once in twenty years opportunity to upgrade and improve the public rights of way network AT LITTLE OR NO COST TO ITSELF. Multi-user paths represent the best use of public money as they are open to the widest range of users. If time and effort is taken to make sure that these new multi-user paths, which will be sorely needed, are linked in to the existing network, then NSC stands to gain not just in terms of reduced traffic and improved safety, but also in making these new communities pleasant places to live. At the same time, it will be able to promote more tourism and make significant improvements in getting people to adopt more healthy lifestyles. The LAF therefore asks that the planners and developers work closely with both the Council's own Rights of Way Department and the LAF to bring about what will be a huge benefit to the area.</p>	
Mr and Mrs Dobson		<p>Place Shaping Principles</p> <p>The principles that have been established to inform and deliver high quality and sustainable places are welcomed. The concern is that the government priority is to increase the provision of housing at all costs and it seems that this can often lead to these principles being sacrificed.</p> <p>The plan states 'The West of England local authorities through their local plans will build good working relationships with developers, infrastructure providers other agencies and local communities to achieve these key principles.' And perhaps suggests that local communities are not at the forefront in place shaping considerations. There is a risk that legislation and regulation will not be strong enough to enable the principles to be upheld and could affect the soundness of the plan.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The plan does not stress the critical situation in the national health service and the increased demand on the service that this significant growth in population would create. The health service in Weston super Mare is under significant pressure. Currently there is no overnight A and E provision and GP surgeries are overloaded. It seems that the NHS needs to be a key stakeholder in the implementation if the plan is to be sound.</p> <p><i>Modifications suggested</i></p> <ul style="list-style-type: none"> • <i>The principles that have been established are welcome and it is important that the plan has mechanisms in place to ensure that they are not watered down.</i> • <i>Put the communities at the centre of the planning process and lobby government to recognise the importance of local issues and not compromise them by introducing over-arching inappropriate policies.</i> • <i>Engage closely with the National Health Service to secure the future of critical health services, which are key to securing many aspects of the plan, including economic growth.</i> 	
Nailsea Unit Trust (c/o Ellandi LLP)	Williams Gallagher	<p>I write on behalf of my client, Nailsea Unit Trust (c/o Ellandi LLP), owners of the Crown Glass Shopping Centre in Nailsea Town Centre, in response to the above-mentioned consultation exercise. We understand that this is a very early stage consultation which seeks the early engagement of stakeholders and interested parties to provide initial views on the new key communities in North Somerset being put forward by the Joint Spatial Plan.</p> <p>The comments within this response are mainly restricted to the new community proposed to the south west of Nailsea which is likely to accommodate up to 2,575 dwellings, 10.5 ha of employment land and a new Local Centre. However, our comments below in respect of defining the extent of a new local centre and approach to defining employment land uses at south west Nailsea are equally applicable to the proposed garden villages at Churchill and Banwell.</p> <p>As discussed throughout these representations, an update to the retail and leisure needs for the district are necessary to ensure any proposed new development is adequately planned for and effective development management policies are put in place. One such policy should be the introduction of a locally set threshold for retail and leisure impact assessment. This will undoubtedly be substantially lower than the current threshold of 2,500 Sqm set by the NPPF.</p>	
Natural England	Natural England	<p>As referred to above, we would strongly urge the council to consider a policy to secure environmental net gain and would expect this to be further considered in the emerging WoE GI Plan.</p>	
oli rodker	ecological land co-operative	<p>I have a general comment about the proposals and sustainability.</p> <p>I am writing as a director of the Ecological land Co-operative. we are a social enterprise dedicated to creating new agro-ecological farm opportunities in England and Wales. we have three successful farms in Mid Devon, one in South Wales, and two in development: one each in Sussex and Somerset. Our farms function within a strong Management Plan that ensures they look after the land in an environmentally sustainable way, and provide good healthy food to local consumers and businesses.</p> <p>You are undertaking a consultation on sustainability, so it is imperative that your plans for new houses and housing developments make no additional impact on carbon emissions and climate change. It is further essential that they have no negative impact on the food economy.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>If you do want to support sustainable food and energy production then you must support the creation of new, local ecological food businesses. The price of land and housing is utterly out of reach for people with ecological farming incomes so the local authority must help here.</p> <p>We champion the use of agricultural ties and we urge you to do the same.</p> <p>We would be very happy to discuss how we could help you to meet your obligations and commitments and be a beacon of sustainability.</p> <p>thank you,</p>	
Parish Councils Airport Association	Parish Councils Airport Association	All policies contained in the Local Plan should be considered in respect of how they meet, and are consistent with, the fifth carbon budget 2028 – 2032 which has been set by the UK government. North Somerset Council should publish a detailed carbon action plan in order that the public can view how carbon emissions will be reduced.	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>We consider the Council should provide clear policy guidance on how the policy on internal space standards for dwellings is to be interpreted and operated in North Somerset to avoid delays that occurred with Reserve Matters applications at Weston Villages. The relevant part of the current policy in the adopted Development Management Policies Plan DM42 which says <i>'Where practical and viable, the Council expects all new build market and affordable housing (across all tenures) to comply with the DCLG's technical housing standards nationally described space standard'</i>.</p> <p>However, the application of Policy DM42 has had implications for the affordability and delivery of housing, including first time buyer units, in particular through delays in dealing with reserved matters applications in Weston-super-Mare. This is contrary to the Government's aspiration to boost home ownership and provide people with the type of house they want in the places they want them.</p> <p>In view of these issues consideration should be given as to whether the policy should be substantially revised and, if it is, we commend the approach in the South Gloucestershire Policies Sites and Places Plan which omits the nationally described space standards for market housing. The Inspector's Report into the plan clearly sets out the reasons for this:</p> <p><i>'Turning to need, the high occupancy levels in affordable housing and the disproportionate number of disabled people it accommodates justifies applying the NDSS and M4(2) standards to this tenure. The evidence presented in the wider Bristol SHMA November 2015, similarly justifies the M4(3) requirements of the policy (paragraphs 3.50-3.53).</i></p> <p><i>However with the possible exception of private renters, residents in the market sector have greater freedom to choose a property which meets their needs and so the size of individual rooms is less critical. In this context, the evidence concerning the link between living space and wellbeing is not related to any local problem. There is no evidence to suggest that the existing housing stock in South Gloucestershire is particularly small: and whilst some recently built market units do not meet the NDSS, others exceeded and there is no evidence of a systematic problem (document S2, appendix 5).</i></p> <p><i>Demographically, the characteristics of South Gloucestershire's population in respect of age and poor health/disability broadly reflect the national picture. However, growth in the population aged 85 years and over is expected to be higher; and there is some national-level data to suggest a shortage of existing dwellings which could be adapted to be fully accessible. These factors, together with the scale of the private rental market, might lead the Council to consider a more targeted policy of this nature in the NLP, but the evidence does not justify the universal approach in Policy PSP37.</i></p> <p><i>Therefore, MM23 omits the standards from market housing. The evidence suggests that viability of affordable schemes would not be prejudice if the standards were to be imposed upon this tenure alone.'</i></p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		We consider that the same circumstances apply in North Somerset and application of the NDSS should be limited to the affordable housing sector and should not be included for market housing.	
Portishead Town Council	Portishead Town Council	<p><u>Employment Land:</u> The Town Council wants to encourage employment opportunities and sees the need for extra employment land in Portishead. The Green Belt is tightly drawn around most of the town. In the allocation of this land, the Town Council is extremely mindful of the pressures of residential development and therefore employment land has to be protected in the long term.</p> <p><u>Residential housing mix:</u> Need a balance of housing mix of type and tenure. Whilst acknowledging the pressures for development around the town, the areas abutting specific sites of significant environmental assets including the RAMSAR designated coastline to the north, SSSIs, SCAs, the wildlife corridor to the east, ancient woodland of Weston Big Wood, and the National Nature Reserve of the Gordano valley must be protected and enhanced over the Local Plan period.</p>	
South West Harp Planning Consortium		Whilst there is no question on the review of the policy for older persons' accommodation, we think it important to highlight the need for improved flexibility in this policy allowing for development of such schemes outside settlement boundaries. The revised NPPF continues to put emphasis on delivering housing to meet all needs and as there is a considerable local level of need, and this is projected to rise significantly in the near future, it is important for local policy to be suitably forward-thinking and responsive to appropriate development proposals.	
Sport England	Sport England	<p>Thank you for consulting Sport England on the above Local Plan Issues & Options document for the plan period up to 2036.</p> <p>Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.</p> <p>The new Sport England Strategy 'Towards An Active Nation' (2016-21) identifies key changes in the delivery of the strategy:</p> <ul style="list-style-type: none"> • Tackle inactivity: more money and resources • Invest in children and young people to build positive attitudes to sport and activity • Help those currently active to carry on, but at a lower cost to the public purse • Put customers at the heart of what we do/be welcoming and inclusive • Help sport to keep pace with the digital expectations of customers • Encourage stronger local collaboration to deliver a joined up experience for customers • Working with a wide range of partners, using our expertise and investment to align • Applying behaviour change principles to encourage innovation to share best practice • Sport England has assessed this consultation in the light of Sport England's Planning for Sport: Forward Planning guidance http://www.sportengland.org/facilities-planning/planning-for-sport/ <p>The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:</p> <p>PROTECT sports facilities from loss as a result of redevelopment</p> <p>ENHANCE existing facilities through improving their quality, accessibility and management</p> <p>PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents																								
		<p>Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government's national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.</p> <p>The following comments are provided within the context of:</p> <ul style="list-style-type: none"> • The National Planning Policy Framework (DCLG, 2018). • Sport England's Planning for Sport webpages (2018). • <u>Economic Value of Sport</u> <p>In terms of the economic value of sport, Sport England has developed a tool that can demonstrate how sport benefits the local economy http://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/. The model produces area based estimates on sports' contribution to the local economy in the form of a business output gross value added (GVA) and jobs plus wider benefits like health. Using the weblink above you can register to use the tool and access the guidance notes including FAQs.</p> <p>-</p> <p>Summary - using level 1 basic snapshot of the tool (automatically generated overall view of the local sport economy indicating the contribution made by businesses and services supporting people playing sport plus the wider interests in sport):</p> <ul style="list-style-type: none"> • Total Direct Economic Value for Sport - £56.5 million • Of which Participation in Sport - £43.5 million • The wider economic value to health is £82.6 million although not directly linked to total direct value of sport. <u>Please refer to the FAQs on the website.</u> <table border="1"> <thead> <tr> <th></th> <th>BaNES £m</th> <th>Bristol £m</th> <th>N Somerset £m</th> <th>S Gos £m</th> <th>TOTAL £m</th> </tr> </thead> <tbody> <tr> <td>Total Direct Economic Value for Sport</td> <td>50.5</td> <td>132.8</td> <td>56.5</td> <td>82.6</td> <td>322.4</td> </tr> <tr> <td>Of which Participation in Sport</td> <td>39.0</td> <td>96.6</td> <td>43.5</td> <td>61.0</td> <td>240.1</td> </tr> <tr> <td>The wider economic value to health</td> <td>89.2</td> <td>186.6</td> <td>82.6</td> <td>112.6</td> <td>471</td> </tr> </tbody> </table> <p>2. <u>Local Plan & Evidence Base</u></p>		BaNES £m	Bristol £m	N Somerset £m	S Gos £m	TOTAL £m	Total Direct Economic Value for Sport	50.5	132.8	56.5	82.6	322.4	Of which Participation in Sport	39.0	96.6	43.5	61.0	240.1	The wider economic value to health	89.2	186.6	82.6	112.6	471	
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		<p>The National Planning Policy Framework (DCLG, 2018) states:</p> <p>96. <i>Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.</i></p> <p>Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.</p> <p>We raise concern that there does not appear to be a robust and up to date evidence base for sport and recreation in North Somerset. We are, however, aware that the Council's Leisure Team are working on a Playing Pitch Strategy and Built Facilities Strategy.</p> <p>3. <u>Planning Obligations/Community Infrastructure Levy (CIL) to Sport</u></p> <p>Sport England supports use of planning obligations (s106)/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base. This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts.</p> <p>All new dwellings in North Somerset in the plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing.</p> <p>This includes the 4 key proposed housing sites:</p> <p>Backwell 700 homes</p> <p>Banwell Garden Village 1900 homes</p> <p>Mendip Spring Garden Village at Churchill 2675 homes</p> <p>Nailsea 2575 homes</p> <p>The evidence base as mentioned in (2) above should inform the Infrastructure Delivery Plan (IDP) and / or CIL Reg 123 list. We all need to be mindful of s106 regulations that restrict up to 5 schemes contributing to a single project. There maybe changes to those regulations in the future including the withdrawal for the need of a 123 list.</p> <p>4. <u>Protection of Sport & Recreation including playing fields</u></p> <p>Sport England acknowledges that the NPPF is promoting "sustainable development" to avoid delays in the planning process (linked to economic growth). Thatsaid, the NPPF also says that for open space, sport & recreation land & buildings (including playing fields):</p> <p>97. <i>Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</i></p> <p>98. <i>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i></p> <p>99. <i>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;</i></p> <p><i>or</i></p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>100. <i>c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</i></p> <p>Sport England would be very concerned if any existing sport & recreation land & buildings including playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management & maintenance and prior to the loss of the existing facility. This includes the major development proposal that could have a negative impact on Churchill Cricket Club in the planned Mendip Spring Garden Village proposal of 2675 homes.</p> <p>Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 97) and against its own playing fields policy, which states:</p> <p>‘Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:</p> <ul style="list-style-type: none"> • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field <p>unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.’</p> <p>Sport England’s Playing Fields Policy and Guidance document can be viewed via the below link:</p> <p>www.sportengland.org/playingfieldspolicy</p>	
Sport England	Sport England	<p>Sport England along with Public Health England have launched our revised guidance ‘Active Design’ which we consider has considerable synergy the Plan. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to www.sportengland.org/activedesign . Sport England believes that being active should be an intrinsic part of everyone’s life pattern.</p> <ul style="list-style-type: none"> • The guidance is aimed at planners, urban designers, developers and health professionals. • The guidance looks to support the creation of healthy communities through the land use planning system by encouraging people to be more physically active through their everyday lives. • The guidance builds on the original Active Designs objectives of <i>Improving Accessibility, Enhancing Amenity and Increasing Awareness (the ‘3A’s’)</i>, and sets out the Ten Principles of Active Design. • Then Ten Active Design Principles have been developed to inspire and inform the design and layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and physical activity and active lifestyles. • The guide includes a series of case studies that set out practical real-life examples of the Active Design Principles in action. These case studies are set out to inspire and encourage those engaged in the planning, design and management of our environments to deliver more active and healthier environments. • The Ten Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design. <p>The developer’s checklist (Appendix 1) has been revised and can also be accessed via www.sportengland.org/activedesign</p> <p>Sport England would encourage development in North Somerset be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.</p> <p>Model Policy for Active Design</p> <p>A suggested model policy for Local Plans and Neighbourhood Plans is provided.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Active Design should be demonstrated in the four major housing sites of:</p> <p>Backwell 700 homes</p> <p>Banwell Garden Village 1900 homes</p> <p>Mendip Spring Garden Village at Churchill 2675 homes</p> <p>Nailsea 2575 homes</p>	
Sport England	Sport England	<p>Making better use of existing resources contributes to sustainable development objectives by reducing the need for additional facilities and the potential loss of scarce resources such as open space. The practice of making school sports facilities available to wider community use is already well established and has been government policy for many years, but there are further opportunities to extend this principle within the education sector through programmes such as Academies and to other privately owned sports facilities, to help meet the growing demand for more and better places for sport in convenient locations.</p> <p>Sport England promotes the wider use of existing and new sports facilities to serve more than one group of users. Sport England will encourage potential providers to consider opportunities for joint provision and dual use of facilities in appropriate locations.</p> <p>Sports facilities provided at school sites are an important resource, not just for the school through the delivery of the national curriculum and extra-curricular sport, but potentially for the wider community. There are also direct benefits to young people, particularly in strengthening the links between their involvement in sport during school time and continued participation in their own time. Many children will be more willing to continue in sport if opportunities to participate are offered on the school site in familiar surroundings. Many schools are already well located in terms of access on foot or by public transport to the local community and so greater use of the sports facilities outside normal school hours should not add significantly to the number of trips generated by private car.</p> <p><i>Use Our School</i> is a resource to support schools in opening their facilities to the community and keeping them open. It provides tried and tested solutions, real life practice, tips from people making it happen, and a range of downloadable resources. https://www.sportengland.org/facilities-planning/use-our-school/</p>	
Stowey Sutton Parish Council		All policies contained in the Local Plan should be considered in respect of how they meet, and are consistent with, the fifth carbon budget 2028 – 2032 which has been set by the UK government.	
WENP	West of Englnd Nature Partnership	The Document identifies the protection and enhancement of the environment as an issue, but does not present clarity on how it might address it. We would strongly urge mechanisms to increase adoption of SuDS in new development. Where well designed, natural flood management systems can yield multiple benefits for recreation, biodiversity and water quality as well as flood management. It is significantly more challenging to retrofit such schemes so we would urge the Council to require such consideration at the pre-application stage.	
Wessex Water (Ruth Hall)	Wessex Water	<p>The Issues and Options consultation identifies that proposed policy wording has not been put forward at this early stage of the plan making process. Wessex Water wish to work with the LPA as the plan progresses to develop suitable policies.</p> <p>The Local Plan should identify the need to restrict development around Sewage Treatment Works (STW) and Sewage Pumping Stations (SPS) to prevent occupiers of new development being affected by odour, insect and fly nuisance and to allow sewage treatment processes and transmission to take place. Wessex Water can provide details of</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>the locations of our STWs and associated odour consultation zones to the LPA. We suggest the following policy for consideration: Policy - Development next to sewage treatment works and pumping stations. Development inside the consultation zone (as shown on the policies map) of an existing, or any future, sewage treatment works or sewage pumping stations will only be permitted if:</p> <ol style="list-style-type: none"> a. the applicant can demonstrate that the proposed development is not likely to be adversely affected by unpleasant odours, insects, noise or vibration; and b. the scale, height, mass, layout and design of the proposed development will not compromise the function or operation of the neighbouring sewage treatment works or pumping station. <p>The need to consider sustainable drainage is identified within the design principles (to guide masterplanning) for several of the development locations. The consultation document does not identify the Councils general approach to SuDs. As the next stage of the plan is produced and proposed policies put forward; Wessex Water recommends that a SuDs policy is developed for inclusion. Applicants should be required to submit details of drainage proposals with planning applications to demonstrate that development can be adequately drained prior to the grant of planning consent. The LPA should consider the inclusion within a SuDs policy the following statement; There must be no surface water connections to foul sewer systems. Applicants must consider approaches to discharge surface water through SuDs in the following order of preference:</p> <ol style="list-style-type: none"> i. into the ground; ii. to a surface water body; iii. to a surface water sewer, highway drain, or another drainage system; and iv. a combined sewer. <p>SuD's which discharge water into the ground or a surface water body may not be appropriate on or close to land with a high water table.</p>	

Document Part Name Submitted sites

Respondent Name	Respondent Organisation	Comment	Attached documents
Alder King (M Cullen)		<p>Land at Wyndhurst Farm</p> <p>The University of Bristol's site at Wyndhurst Farm measures 3.2 hectares and is located adjacent to the Service Village settlement boundary of Langford. It is sustainably located with easy access to many day to day services available within reasonable walking and cycling distance of the village core. It is wedged between the A38 to the south and Langford Road to the north. The 'Esso' garage and Saint Mary's church are located on the western boundary of the site.</p> <p>According to the Council's current development plan there are no planning policy constraints affecting the site.</p> <p>Requirement for small sites</p> <p>In addition to the SDLs, the University of Bristol supports the local housing growth that is required across North Somerset to meet 'non-strategic' requirements. The second part of the representations provide responses to the relevant consultation questions in section 3 of the 'Issues and Options' consultation document.</p> <p>The consultation document rightly highlights the need for 'non-strategic' development in sustainable locations across the district. The intention is that this will help to ensure that a wider range of sites are available in a variety of locations to provide greater choice. Furthermore, sites under the 'non-strategic' umbrella could range from</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		anything from 50 to 499 dwellings, which will provide greater flexibility in the market and should help to ensure an increased and more consistent rate of delivery of new homes over the plan period.	
Alvis Family		<p>The opportunity should be taken with the North Somerset Local Plan to both serve North Somerset's requirements in an appropriate way according to evidence, and to influence the evolution of a sound and sustainable spatial strategy for the West of England through the JSP. Making use of the Alvis Family land at Chapel Pill, and engaging positively with the Alvis Family and its agents would enable these objectives to be met.</p> <p>The location of the land is shown on the Connectivity Plan, included with these submissions as Appendix 1. The Site Boundary Plan at Appendix 2 indicates the potential relationship between a site that could be brought forward as a non-strategic deliverable contribution to the early stage provision through the district local plan, and a well located strategic site that would add to the overall provision and improve the spatial strategy in the West of England JSP. The early stage site lies within the context of other development and relates directly to a main transport route well served by bus routes.</p>	ChapelPillRepsonNSLPlanOsDec18.pdf (686 KB)
Aston	Aston and Co UK	<p>See attached documents. The attached reports provide feedback on the issues raised in this consultation, evidence supporting the need for a review of the Green Belt and support of development at Black Rock, Portishead (HE18124) for sensitive development beneath the 15m contour.</p> <p>Flood risk must remain a primary consideration in directing future development to the lowest risk areas - especially in light of IPCC Special Report on Limiting Global Warming October 2018 and recent world and local events. Surprised and concerned that land outside areas of risk are discounted because of Green Belt but sites in flood zones must be the most sustainable solution ahead of proposed garden villages whose viability remains to be established. Concerned that current site selection process has failed to take account of JSP Green Belt reviews. Need similar flexible approach in North Somerset to that undertaken at Keynsham - to avoid placing housing in areas of flood risk or unsustainable locations.</p> <p>Large scale sites of 500+ units where not individually identified in the NSC Green Belt. Smaller sites of c.100-200 units could be found in Green Belt adjacent to existing main towns and collectively provide strategic scale solutions. We have an example site. Sites could be brought forward swiftly. Sites near to existing service centres must be the most sustainable solution ahead of proposed garden villages whose viability remains to be established. Need to review existing settlement boundaries irrespective of Green Belt to create an initial shortlist. Sites should then be tested against the full range of relevant constraints. This important option review is falling between the JSP approach where they are not considering smaller sites, and NSC who are not considering a localised review of the Green Belt as the JSP has not highlighted that as a requirement within NSC.</p> <p>The assessment tables in SHLAA contain insufficient detailed analysis of all the relevant and important criteria necessary to select the correct land. Under 'transport', a comment is made on vehicular access to a highway but not public transport, pedestrian and cycle links to essential services and jobs. Need evidence on proximity to main utility services, whether capacity exists and if not, the likely time and cost of providing necessary infrastructure. These are all matters that identify sustainable locations and sites that can bring forward housing within 5 years to</p>	1-Issues and Options_2016_2036_RESPONSE_Aston_and_Co_5.12.18.pdf (1.3 MB) 2-Issues_and_Options_COVER LETTER_Aston and Co_FINAL_5.12.18.pdf (207 KB) 3-BlackRock_HE18124_PLANNING STATEMENT.pdf (1.5 MB) 4-BlackRock_HE18124_CULTURE AND HERITAGE.pdf (12.9 MB) 5-BlackRock_HE18124_BRISTOL AND BATH GREEN BELT REPORT.pdf (4.0 MB) 6-BlackRock_HE18124_ECOLOGICAL_CONSTRAINTS_AND_OPPORTUNITIES_Landmark 1 of 2.pdf (4.7 MB) 7-BlackRock_HE18124_LANDSCAPE_VISUAL_APPRAISAL_Landmark 1 of 2.pdf (16.4 MB) 8-BlackRock_HE18124_EIA_SCREENING REQUEST AND RESPONSE_Feb 2018.pdf (2.1 MB) 9-BlackRock_HE18124_SUMMARY_OF_FULL_SEASONS_ECOLOGICAL_SURVEYS_Landmark 2 of 2.pdf (154 KB) 10-BlackRock_HE18124_TRANSPORT_FEASIBILITY REPORT_Connect Highway Consultants.pdf (2.0 MB) 11-BlackRock_HE18124_POSITION_NOTE_LANDSCAPE SENSITIVITY STUDY_Landmark 2 of 2.pdf (139 KB) 12-BlackRock_HE18124_FLOOD RISK ASSESSMENT.pdf (3.7 MB)

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>address the persistent under supply. Evidence to support the selection of the right land will be available by engaging with developers, agents and landowners. Promoters should be asked to supply evidence of development viability and this should be tested against a common model such as that produced by Homes England.</p>	
C Twine		<p>I write on behalf of my Mrs Catherine Twine who owns land to the south of Winford, Bristol. A Site Location Plan is appended to this representation. We write ahead of the consultation deadline on the 10th December to set out our views in relation to a range of questions contained within the Issues and Options document. 1.2 The site has been the subject of pre-application engagement (18/P/3585/PRE) with the Council earlier in 2018. Flowing from that engagement we are now actively promoting the site through the Local Plan process in line with officer feedback.</p> <p>SITE CONTEXT</p> <p>Land at Court Farm, Winford is located on the south eastern edge of the village of Winford. The site is bound to the north by existing residential development (Russell Close), to the east by agricultural land and to the south and west by Chew Road (B3130) and Regil Lane respectively.</p> <p>Winford is defined by Policy CS33 of the existing Core Strategy as an infill village which has a defined settlement boundary. The Court Farm site adjoins the settlement boundary along its northern, southern and western edges.</p> <p>Winford is one of several settlements which are washed over entirely by the Green Belt. This approach is by no means consistent across the District and this is a matter to which we revisit within the statement below.</p> <p>The site benefits from an existing field access onto Chew Road from which there is a footpath which leads into the centre of the village. It is our understanding there is a recognised highways issue along Chew Road due to width restrictions and limited footpath connections for existing properties of Lye Mead and Regil Lane. Our site is the only land which can address this concern.</p> <p>Winford is considered to be a sustainable settlement which benefits from a range of services and facilities including a Primary School, Post Office and general store, public house and village hall.</p> <p>Within the rest of this consultation response we set out our response to the relevant sections of the Issues and Options Plan (IOP). The structure largely echoes that of the IOP, taking relevant chapters in turn using the same headings as per the IOP.</p>	<p>Mrs_Catherine_Twine.pdf (1.2 MB)</p>
Coln Residential (DLP Planning)		<p>LAND AT DINGHURST ROAD, CHURCHILL</p> <p>The Proposed Site</p> <p>The proposed site, outlined in red on the enclosed Site Location Plan (Appendix 1), is located immediately to the south of Dinghurst Road and to the east of Skinners Lane in the settlement of Churchill. The site covers approximately 2.18 hectares and is currently in agricultural use.</p>	<p>Land at Dinghurst Road Churchill_Coln Residential_NSC LP Issues and Options Consultation Reps_Final_101218.pdf (3.6 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>Although the site is situated at the centre of the village of Churchill, it falls outside of Churchill's three existing defined settlement boundaries. An inspection of the North Somerset Proposals Map confirms that the site is outside of but immediately adjacent to Churchill's middle settlement boundary.</p> <p>The site is split into two tree-lined fields which are divided from one another by an existing hedgerow. A gap at the southern end of the hedgerow allows access between the two fields. The site is currently accessed from Skinners Lane via a field gate opposite the Crown Inn Public House.</p> <p>The site is bounded to the north by Dinghurst Road and to the west by Skinners Lane and a number of dwellings. The eastern and south-eastern edges of the site are bounded by residential dwellings and their associated gardens, this side of the site abuts Churchill's settlement boundary. The southern side of the site is bounded by Skinners Lane, Cherry Tree Farm and two small fields. The area surrounding the site is characterised by existing residential areas and agricultural land.</p> <p>The site does not lie within the Green Belt, Strategic Gap or a Conservation Area and there are no listed heritage assets within the site. The site is not located within the Area of Outstanding Natural Beauty (AONB), however the AONB boundary is immediately to the south on the opposite side of Skinner Lane (please see attached Constraints Plan at Appendix 2).</p> <p>The site is within the Bat Consultation Zone Band C. In terms of ecology, thus far Tyler Grange have undertaken a background data search, Phase 1 Surveys, bat activity surveys and dormouse surveys.</p> <p>The Environment Agency's Flood Map shows the site to be within Flood Zone 1, meaning it has the lowest probability of flooding. No Public Rights of Way cross the site.</p> <p>It can therefore be concluded that the site is not subject to any fundamental physical development constraints.</p> <p>Residential properties to the east of the site are predominantly two storey detached dwellings with garages and no dominant architectural style. The area to the west features a considerable number of residential properties. Similarly to those properties on the eastern side of the site, the properties to the west are predominantly two storeys and detached but include semi-detached properties and bungalows. Again, there is no dominant architectural style presented by the properties to the west.</p> <p>Churchill benefits from a secondary school and sixth form located approximately 800m to the west of the site and the Churchill Church of England Primary School is approximately 850m to the north-east. The Wrington Vale medical practice is located approximately 900m to the north-east on Pudding Pie Lane. The post office, village store and café are located 500m to the north-west of the site on Front Street. There are also two public houses (The Crown Inn and the Nelson Arms) in the immediate vicinity of the site, with two further pubic houses located along the A38 approximately 600m to the north-east. The memorial hall and recreation ground are located to the north of the site off Ladymead Lane.</p>	

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		<p>Weston-super-Mare is approximately 11km to the west of the site and Bristol is approximately 14km to the north-east. Bus stops are located along Dinghurst Road, Bath Road and Bristol Road, providing links to Weston-super-Mare, Bristol, Nailsea and Winscombe amongst others.</p> <p>Deliverability and Availability of Land at Dinghurst Road</p> <p>Coln Residential are a regional housebuilder with a proven record of delivering high quality housing sites throughout the South-West. Land at Dinghurst Road, Churchill is in single ownership with Coln Residential looking to bring the site forward as a joint venture with said landowner. A pre-application enquiry has recently been submitted to North Somerset Council</p> <p>The site is immediately available and no land off-site will need to be acquired to develop the site. There are also no current uses which would need to be relocated.</p> <p>Development at Land at Dinghurst Road is not subject to any fundamental development constraints or reliant on the major transport infrastructure outlined in the emerging West of England JSP coming forward. It is therefore believed that the site can be brought forward early in the plan period.</p> <p>Emerging Development Layout</p> <p>Coln Residential are in the process of producing a masterplan of the site. The site is approximately 2.18 hectares in size. As a general guideline, Policy CS14 suggests 40 dwellings per hectare in service villages. Using this calculation, the site would have potential for 87 dwellings. However, this general calculation does not take into consideration the characteristics of the site, the density of the surrounding residential areas and the amount of land needed for green space and landscape buffers. The emerging site layout currently includes 51 dwellings, which equates to a density of 23.4 dwellings per hectare. This lower housing density is deemed appropriate due to the site's semi-rural location and the density of the surrounding residential areas.</p> <p>The scheme could comprise a mixture of detached houses, semi-detached houses and flats.</p> <p>A new vehicular access is proposed into the site from Dinghurst Road. This can be created through a narrow incision in the tree belt leading to a new estate road forming a meandering loop, with the dwellings positioned inside. The dwellings within the loop are arranged to provide an articulated build-line and roof planes. This gives an interesting vista on entering the site and is in line with the urban grain of the existing properties immediately adjoining.</p> <p>The western parcel is designed to stand alone to protect the integrity of the existing hedgerow. Access is gained from Skinners Lane, again through a narrow cut in the tree belt.</p> <p>Land at Dinghurst Road, Churchill is not subject to any fundamental development constraints or reliant on the major transport infrastructure outlined in the emerging JSP coming forward. It is therefore believed that the site can be brought forward early in the plan period. We would contend that the Council should reconsider its grading in the SHLAA and consider the site as a potential non-strategic allocation.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The site can make a significant contribution to the Council's emerging housing target. Coln Residential urge the Council to consider allocating Land at Dinghurst Road, Churchill for residential development in the New Local Plan.</p>	
EWH	Edward Ware Homes	<p>1. INTRODUCTION</p> <p>1.1 I write on behalf of my client Edward Ware Homes who have a land interest on land south of Langford, Bristol. A Site Location Plan is appended to this representation. We write ahead of the consultation deadline on the 10th December to set out our views in relation to a range of questions contained within the Issues and Options document.</p> <p>1.2 The site has been previously promoted by Pegasus Group on behalf of our clients as part of the West of England Joint Spatial Plan (JSP) and the North Somerset Site Allocations Plan (SAP).</p> <p>2. SITE CONTEXT</p> <p>2.1 Land south of Langford is positioned to the south of existing properties along Bristol Road (A38). The site extends eastward towards properties on Says Lane and to the west where it bounds the Bath Road (A368). Langford is identified by the existing Core Strategy as a Service Village (Policy CS32: Service Villages).</p> <p>2.2 The village is situated a short distance to the east of Weston-Super-Mare and Junction 20 of the M5 as well as having good A-road connections towards Bristol and Bridgwater. Churchill/Langford benefits from a wide range of services and facilities including but not limited to a doctor's surgery (Mendip Vale), primary school (Churchill CVEC Primary School), secondary school (Churchill Academy & Sixth Form) and a post office and general store.</p> <p>2.3 Our clients land directly adjoins two existing allocations adjoining the settlement both of which benefit from outline consent.</p> <p>2.4 We are aware of the current Churchill Garden Village proposal (Policy 7.6 of the JSP). This identifies an area of search to the north west of Churchill and Langford which has been identified as being capable of delivering some 2,675 dwellings and a new local centre. This would indicate that Churchill/Langford is capable of accommodating additional growth, albeit we have concerns regarding the deliverability of such a scale of development in this location, particularly when such a location is better suited to the delivery of nonstrategic sites (i.e. 500 units or less). We consider that Langford is a suitable location at which a greater proportion of non-strategic housing need identified by the JSP could be made.</p> <p>2.5 Within the rest of this consultation response we set out our response to the relevant sections of the Issues and Options Plan (IOP). The structure largely echoes that of the IOP, taking relevant chapters in turn using the same headings as per the IOP.</p> <p>Land South of Langford</p>	<p>Edward Ware Homes.pdf (1.1 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>4.17 Our clients land at Langford is sustainably located and well related to the changing settlement of Churchill. It is relatively unconstrained and offers a realistic prospect of delivering non-strategic development. My clients have a proven track record of bringing forward land in Churchill given the two aforementioned allocations which both will soon benefit from detailed permissions.</p> <p>4.18 Given our commentary regarding the settlement boundary and its implications in terms of the SHLAA approach we would urge the Council to re-assess this land parcel as it can easily assist in providing for non-strategic housing development.</p> <p>4.19 We would welcome the opportunity to discuss the site further with North Somerset Council during the new Local Plan progressions.</p>	
Gallagher Estates (represented by Barton Willmore)	Barton Willmore	<p>1.0 INTRODUCTION</p> <p>1.1 These representations are submitted on behalf of Gallagher Estates in response to the North Somerset Local Plan 2036 Issues and Options Consultation (September 2018) in respect of land at Pill, North Somerset. (A site plan is provided on page 12 of the enclosed Masterplan Discussion Document at Appendix A)</p> <p>1.2 The land at Pill (Pill Green) is currently being promoted as a Strategic Development Location (SDL) through the emerging West of England Joint Spatial Plan (JSP). Notwithstanding this, and in the absence of a strategic allocation, we consider that there is also merit in bringing forward non-strategic development at Pill Green, which would be sustainably located, deliverable and appropriate.</p> <p>1.3 We would welcome dialogue with North Somerset Council Officers to discuss the exact location of a non-strategic site at Pill Green and the benefits that infrastructure investment in Pill could bring.</p> <p>1.4 We note that the Local Plan intends to support and guide the implementation of the draft JSP; however, alongside many others, we have concerns about the fundamentals of the JSP in terms of housing numbers and locations for development, which has implications for North Somerset's Local Plan Review.</p> <p>1.5 The JSP requires local authorities to identify and allocate the SDLs and non-strategic growth through the review of their local plans, which is a focus of our representations.</p> <p>Various attachments promote land at Pill Green.</p>	<p>Green Site Appendix C B willmore.pdf (4.5 MB)</p> <p>Green site, Appendix A B Willmore.pdf (5.2 MB)</p> <p>Green Site Appendix B B Willmore.pdf (6.3 MB)</p> <p>Green Repls.pdf (628 KB)</p>
Gladman Developments Ltd	Gladman Developments	<p>5.1.1 Gladman are promoting a number of sites for residential and employment development across the North Somerset authority area. Each of the housing sites are situated in a sustainable location, and offer the potential to achieve high quality residential developments to meet the authority's housing needs.</p> <p>5.1.2 Site specific forms have been completed separately and accompany the submission of this representation. In no particular order of importance or suitability for development, the sites comprise:</p>	<p>Gladman 18.12.10 North Somerset Local Plan Issues Options Repls FINAL.pdf (1.1 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>5.1.3 Gladman would welcome a meeting with the Council to discuss how the above sites can help the Council in the delivery of the housing requirement and a balanced spatial strategy in the new Local Plan.</p> <ul style="list-style-type: none"> • Land south of Knightcott Road, Banwell; • Land at Elm Grove Nursery, Locking; • Land south of Wood Hill, Congresbury; • Land south of Bristol Road, Portishead. <p>5.1.3 Gladman would welcome a meeting with the Council to discuss how the above sites can help the Council in the delivery of the housing requirement and a balanced spatial strategy in the new Local Plan.</p> <p>5.2 Land south of Knightcott Road, Banwell</p> <p>5.2.1 Gladman are promoting a site at Land south of Knightcott Road, Banwell for a residential development of circa 60 dwellings (see location plan below).5.2.2 The site is located on the western edge of Banwell. Banwell is located 8km east of Weston-super-Mare on the A371. The 3.51 ha / 8.67 acres site is situated immediately adjacent to existing built development to the west of the village. The site is bound by the A371 Knightcott Road and an individual residential property to the north, open countryside to the south, a mix of existing residential development, associated with Knightcott Gardens directly abuts the eastern boundary.</p> <p>5.2.3 An outline application has been submitted by Newland Homes for up to 26 dwellings on land to the south of William Daw Close (application ref: 18/P/3334/OUT). The Council has approved a full application for 10 dwellings (app ref: 15/P/0968/O) on the Western Trade Centre located to the west of the proposal site. A further outline application for up to 20 dwellings on the same site (app ref: 18/P/3180/OUT) has recently been refused planning permission by the Council.</p> <p>5.2.4 The site itself contains no built structures but there are a number of hedgerows and mature trees within the site and along its boundaries. A single main vehicular access point into the site via Knightcott Road is proposed. An existing Public Right of Way (PRoW) runs diagonally across the site in a north east to south westerly direction, this will be retained and enhanced as part of the site proposal. The site comprises one pasture field which is largely enclosed by hedgerows. Main vehicular access to the site is to be taken from Knightcott Road to the north.</p> <p>5.2.5 The nearest bus stops to the site are situated on Knightcott Road and are in very close proximity to the proposed site access. There are three bus services which operate along Knightcott Road and past the site including the No. 126 (Weston-super-Mare – Wells), No. 134 (Bishop Sutton – Weston-super-Mare) and No. 62 (Locking – Bridgewater). The no.126 service provides a half hourly peak service (then hourly service) throughout the day to Weston-super-Mare (Mondays to Saturdays). The no. 126 provides 8 services on Sundays.</p> <p>5.2.6 Banwell is identified as a Service Village in the adopted Core Strategy and is capable of accommodating additional residential development over the plan period. Banwell has a good range of local facilities and services. that are within easy walking and cycling distance of the site including: Banwell Primary School, Banwell Buddies Pre School, Banwell Village Hall, Co-operative Supermarket, Banwell News and Post Office, Banwell Community</p>	

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		<p>Sports Hall, Banwell Children's Centre and Youth Centre, Winscombe and Banwell Family Practice, Banwell Pharmacy, Recreation Ground, three churches and two pubs.</p> <p>5.2.7 Gladman are aware of the dismissed appeal decision (APP/D0121/W/15/3138816) issued on the 13th October 2016 for a larger application for up to 155 dwellings. However, by reducing the site size considerably and only proposing to deliver residential development on the northern field, it is considered that this will address the concerns of the Inspector raised in his decision letter.</p> <p>5.2.8 Gladman can confirm that the site is available, offers a suitable location for development now and is achievable with a realistic prospect that the housing will be delivered within five years.</p> <p>5.3 Land at Elm Grove Nursery, Locking.</p> <p>5.3.1 Gladman submitted an outline application for up to 110 dwellings (app ref: 18/P/2652/OUT) on this site in March 2018 which is currently under consideration by the Council (see location plan below).</p> <p>5.3.2 The 6.75ha site is located on the south-western edge of Locking. The site comprises two large agricultural fields intersected by a mature hedgerow running north-south. The site's boundaries are formed by mature trees and hedgerows and there is a small copse in the north-western extent of the site. Disused former nursery buildings stand in the north-eastern corner of the site, near to the point of access off Elm Grove. The site is bounded to the east and north-east by existing residential development, to the north and south by open countryside, and by a caravan park to the west and north-west. The western larger field has recently been allocated as part of the Strategic Gap (Policy SA7) within the Sites and Policies Plan Part 2: Site Allocations Plan (April 2018) despite there being no evidence submitted by the Council to the examination to support this allocation.</p> <p>5.3.3 Locking is a sustainable settlement on the edge of Weston-super-Mare with a good range of services and facilities. Within 1km of the site there is a primary school, village hall, grocery store, post office, pharmacy, recreation ground, public house, takeaway, and hairdressers. There is also a part-time outreach GP surgery and mobile library service. All of these facilities are easily accessible from the development site via safe walking routes along footpaths adjoining well-lit highways.</p> <p>The site also lies less than 1km from two large Sustainable Urban Extensions which are being developed - Locking Parklands and Winterstoke Village, which will provide an additional 6,000 dwellings over the plan period and beyond. The Weston Villages will also provide a wide range of additional services and facilities including retail, employment and education which will all be within walking/cycling distance of the site and hence will further enhance significantly its sustainability credentials.</p> <p>5.3.5 The site also has good access to public transport with a bus stop located within 400m of the site. Bus service no. 126 runs from Wells to Weston-super-Mare via Locking on an hourly basis Monday-Saturday daytimes. Locking is also served by service A2 which runs roughly hourly Monday-Saturday daytimes to destinations including Nailsea, Bristol Airport and Weston-super-Mare. Railway services to destinations including Bristol and London can be accessed from Weston-super-Mare station which is accessible by bus from the site.</p> <p>5.3.6 Locking is capable of taking additional residential growth which will help to sustain and enhance the existing services and facilities in the village. Gladman can confirm that the site is available, offers a suitable location for development now and is achievable with a realistic prospect that housing will be delivered within five years.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>5.4.1 Gladman are currently promoting a site at ‘Land south of Wood Hill, Congresbury’ for residential development for circa 130 dwellings (see location plan below).</p> <p>5.4 Land south of Wood Hill, Congresbury</p> <p>5.4.2 The 6.8 ha site is located to the north of the village of Congresbury. Congresbury is located 11 km east of Weston-super-Mare on the A371. The site is situated immediately adjacent to existing built development to the west of the village. The site is bound by the narrow tract of Wood Hill to the north and an existing residential property (which will be retained), open countryside to the south, Cadbury – Wyevale Garden Centre to the south-west and allotments to the east.</p> <p>5.4.3 The site is split into two distinct parcels. The western parcel is currently pasture, with access from Smallway and Wood Hill. The eastern parcel, with two accesses from Wood Hill is a combination of a small plant nursery with an existing dwelling, and a small paddock used for livestock. The south western part of the eastern parcel of the site consists of a number sheds associated with its use as a plant nursey, along with numerous Poly tunnels and a small stone barn. There is a small block of stables in the north eastern corner of the eastern parcel. A number of hedgerows and mature trees are within the site and along its boundaries. An existing PRoW is immediately adjacent to the eastern boundary of the site and runs in a north to south direction, this will be retained and enhanced as part of the site proposal.</p> <p>5.4.4 The nearest bus stops are situated on the A370 Bristol Road to the south of the site, which can be accessed via the PRoW to the east. Congresbury is serviced by six bus routes. The most frequent are the W1, X1 and X2 buses, which offer a regular service between Weston-super-Mare and Bristol daily, arriving 2/3 times an hour between 06.05 and 18.52 (Monday – Friday). The last X1 service from Weston-super-Mare to Congresbury is at 22.48. There are on average 3 services per hour during the day on Saturdays and 2 services per hour on Sundays and Bank Holidays.</p> <p>5.4.5 Congresbury is identified as a Service Village in the adopted Core Strategy and is capable of accommodating additional residential development over the plan period. Congresbury has a good range of local facilities and services. that are within easy walking and cycling distance of the site including: St Andrews Infant / Junior School, Tesco Express Store, Post Office, St Andrews Church, Memorial Hall, Medical Practice, Congresbury Library.</p> <p>5.4.6 Gladman can confirm that the site is available, offers a suitable location for development now and is achievable with a realistic prospect that housing will be delivered within five years.</p> <p>5.5 Land south of Bristol Road, Portishead</p> <p>5.5.1 Gladman are promoting the land to the south of their existing employment business park (south of Bristol Road (A370)) for an employment allocation within the Local Plan. The site is currently designated as Green Belt, however it is acknowledged in the Issues and Options consultation document that there is the potential of allocating additional employment land in Portishead through small-scale Green Belt releases.</p> <p>5.5.2 The size of the land which is in Gladman’s ownership is approximately 6.8 acres. Site access would be achievable off Bristol Road through Gladman’s existing employment site via the internal spine road. There are a number of local businesses who are already accommodated on the business park as well as four offices used by Avon & Somerset Police Force.</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>5.5.3 The first employment site was built in two phases. Phase 1 was built in 2005/06 and Phase 2 was completed in 2007. The existing employment site is extremely successful and is almost fully let with current vacancies only due to churn in the market. The site is available, suitable and achievable and can be delivered fairly quickly as can be seen with the first employment business park.</p>	
Hayes Family and Mr Cope		<p>LAND TO THE WEST OF THE M5 AND EAST OF TRENCHARD ROAD, LOCKING</p> <p>INTRODUCTION On behalf of the Hayes Family and Mr Cope, Grass Roots Planning have been instructed to prepare and submit representations to North Somerset Council's (NSC) Issues and Options Document in support of the Local Plan Review, which is out for consultation until the 10th December 2018.</p> <p>NSC are currently conducting their second stage of consultation (following the 'Generating Ideas' consultation in early 2018), in respect to the Local Plan Review, which will seek to allocate specific sites in conjunction with the emerging Strategic Development Locations (SDLs) set out within the West of England Joint Spatial Plan (WoE JSP), as well as nonstrategic growth allocations.</p> <p>We have previously submitted representations in respect to land west of the M5 and east of Trenchard Road, Locking, to promote the site for allocation in the Sites and Policies Plan Part 2: Site Allocations document (SAP) in 2017. We now propose that this land be allocated for residential development in the North Somerset Local Plan Review (2018 – 2036), to contribute to non-strategic growth levels.</p> <p>An outline planning application was submitted to NSC on behalf of the landowners in April 2018 (Application Ref: 18/P/3038/OUT) for up to 110 dwellings, public open space, landscape, drainage and ancillary works, and is currently pending consideration. A site location plan and masterplan is provided in Appendices A and B respectively.</p> <p>We consider that land to the west of the M5 should be allocated for residential development to meet non-strategic growth levels. The overall quantum that the site could deliver would be for up to 110 dwellings and the proposals can make a significant contribution to five year housing land supply and provide a sustainable location for development.</p> <p>THE SITE The site consists of 6.1 hectares of land comprising two triangular parcels (a north and south parcel), that are bound by existing residential development to the west, proposed residential development to the north (land south of Wolvershill Road (Application Ref: 16/P/2744/OT2) & Locking Parklands), the M5 to the east and the A371 to the south. The land was previously used for agriculture as part of the wider parcel of land but due to its reduction in size over the years, it is now too small for productive use. It is therefore currently used as a paddock for horses and rough pasture.</p> <p>The immediate surrounding context consists of residential development (both built and currently being developed), including the approved Locking Parklands Scheme (Application Ref: 12/P/1266/OT2 and 13/P/0997/OT2), which will also provide employment land, and residential, commercial and leisure uses in the future. A separate application to the north of this site (Ref: 16/P/</p>	<p>460 A3 CC 181207 Reps to NLP Issues Options - Land west of the M5 (Part 1 of 2).pdf (5.3 MB)</p> <p>460 A3 CC 181207 Reps to NLP Issues Options - Land west of the M5 (Part 2 of 2).pdf (7.5 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>2744/OT2), submitted by Mead Realisations, has been approved by the Council for up to 250 residential dwellings (part of the site delineated in orange in figure 1 in the attached document). On the other side of the M5, there are agricultural fields which have been earmarked for development as part of the Banwell Garden Village SDL, put forward in the emerging JSP.</p> <p>The Grumblepill Rhyne forms the northern boundary of the site and is a local wildlife area which is designated for its diverse flora (considered to be an SNCI); however this designation does not go beyond the watercourse and the Rhyne is currently very overgrown. There are no other designation such as an AONB, Conservation Area, or Flood Zone that apply to the site, and no listed buildings lie within close proximity to it.</p> <p>NSC'S ASSESSMENT OF LAND WEST OF THE M5</p> <p>We have previously put forward land west of the M5 as a potential allocation in the Site Allocations document. The site has been re-assessed in the most up-to-date NSC Local Plan SHLAA under reference HE18409. An extract of the assessment is provided in Appendix C for ease of reference but a summary has been provided which states the following: <i>'Site adjoins M5, likely to be unacceptable impacts upon residential amenity. Development of this site also potential to prejudice future planning and delivery of new J21A'</i>.</p> <p>Also of note is the Landscape Sensitivity Assessment which was published alongside the Issues and Options Consultation documents. An extract of this assessment is provided in Appendix D, which indicates that the site has high landscape sensitivity.</p> <p>We disagree with the above assertions and have provided technical evidence on numerous occasions regarding the site's sustainability credentials including evidence to rebut comments regarding the site's ability to prejudice the delivery of J21A. We set this out below.</p> <p><u>Landscape</u></p> <p>Alongside these representations we have provided technical evidence including an Environmental Statement landscape assessment which can be found in Appendix E. Of note, the application which was submitted in April 2018 has received no comments from the landscape officer at NSC, which indicates that there are no significant issues with the sensitivity of the landscape. It also seems contradictory that a site deemed to have high landscape sensitivity would also be suitable for a new motorway junction.</p> <p>The landscape work, prepared by Liz Lake Associates, indicates the following: 'At the local scale, the M5 motorway is located immediately to the east of the site, thereby imposing its strong influence on the character of the site... the site is therefore relatively well contained by surrounding residential development, a major transport route, and existing vegetation associated with the Grumblepill Rhyne and the motorway'.</p> <p>The assessment determined the site as having a minor positive contribution to the local landscape character, which, following extensive mitigation incorporated into the design proposals, resulted in a negligible effect in the long term. We therefore consider that the Council's assessment in relation to landscape is incorrect and would urge officers to consider the technical evidence presented as part of these representations and the application submission.</p> <p><u>Residential Amenity</u></p>	

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		<p>The Council highlights potential issues regarding the proximity of the M5 and noise / amenity impacts regarding this.</p> <p>As part of application 18/P/3038/OUT, a noise assessment was provided and this demonstrated that noise levels acceptable for residential use could be achieved across the site if certain mitigation measures were adopted (creation of noise bund, insulation and venting measures etc.) (copy provided in Appendix F). At reserved matters stage, further detail could be provided in respect to orienting blocks and internal areas to provide best practicable noise levels in external areas and to minimise habitable room facades in the worsecase areas of the site. In addition, specific acoustic glazing and ventilation will be implemented.</p> <p>Similar mitigation measures were found acceptable on the application for the Mead Realisations land to the north of this site, which was granted planning permission.</p> <p>As such, we consider that issues raised in relation to amenity and noise associated with the M5 are negligible provided that adequate mitigation has been provided. This has been found acceptable at other development locations, such as land to the north of this site, and we consider that this does not preclude the site coming forward as an allocation for development. Prejudicing the delivery of J21A</p> <p>As we have set out in previous representations, and within our planning application, the development of the site would not preclude the delivery of J21A. We remain of the view that the long term aspiration of J21A should not prevent the allocation of the site at the current time.</p> <p>It should be noted that the JSP does not propose to take forward J21A as a transport mitigation package any longer but there are still long term aspirations to deliver this. The draft Joint Local Transport Plan 4 (JLTP4) was published at the end of November 2018 and this does make reference to a J21A; however, there are still no technical designs nor any particular indication as to the location of J21A nor how it will be funded. There is some reference to a national bid for infrastructure funding but it is not clear exactly how much of the scheme can be funded without the delivery of the Banwell and Churchill Garden Villages, and their immediate priorities will be to deliver the Banwell bypass.</p> <p>We are not opposed to the delivery of a J21A but suggest that the Council's stance on this consideration currently is inappropriate due to the complete lack of technical evidence and /or design.</p> <p>Whilst the JSP and JLTP4 is a material consideration, neither document is in an advanced stage and provides little to no indication of the exact location of any potential junction, nor any tangible evidence that a junction is feasible and financially viable in this instance.</p> <p>If the proposals were to come forward, the aspiration of the Council seems to be to deliver J21A in the general area where the A371 crosses the M5. There is a large amount of land in this area within which to deliver the as yet undefined junction, albeit all options would require the purchase of third party land and properties. We have demonstrated on a number of occasions that there is sufficient land to deliver a junction south of the site and an extract of this can be found in Appendix G to these representations.</p> <p>Therefore, we do not consider that the site would preclude the delivery of J21A and again would urge the Council to consider the evidence submitted which demonstrates this.</p>	

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		<p>Overall, we have serious concerns that the Council are using an as yet theoretical infrastructure proposal that has no fixed time horizon, is not funded or designed in any form of detail, to preclude the development of this site. This is a very unreasonable approach and we urge the Council to reconsider their stance in this regard.</p>	
John Phillips Planning Consultancy	John Phillips Planning Consultancy	<p>Land at former Blackmoor Farm, Blackmoor, Langford, near Churchill</p> <p>The land in question measures approximately 3.5 acres (1.4 hectares) and shown on the two accompanying plans (location and site plan) with its boundaries edged red. The site is set close to the heart of Langford with housing development existing on three sides to the north east and south. The land originally formed part of the much larger farm holding known as Blackmoor Farm of which the majority of the farm land to the west of the site was sold to the University of Bristol Veterinary College a number of years ago.</p> <p>The farm therefore became unviable as an agricultural unit and the site has remained redundant for a number of years. The site still retains a farmhouse close to its entrance which is currently vacant together with a small number of agricultural buildings in a poor state of repair.</p> <p>The site is relatively flat throughout with current substandard access particularly upon exiting from the driveway given very limited vision to the south along Blackmoor. Any new housing proposal will need to incorporate an entirely new highway access along the site frontage with Blackmoor. Initial discussions with highway consultants have confirmed that a new access can be achieved to meet accepted highway standards.</p> <p>There appear to be no insurmountable site constraints to future development and we would suggest a possible scheme for between 20– 40 dwellings given current density requirements.</p> <p>The site is within easy walking distance of the settlement core which is centred around the junction of Blackmoor and Langford Road and relatively close to nearby Langford / Churchill. The site also benefits from the A5 bus service immediately adjacent to the site which links Winscombe / Yatton – Langford – Bristol Airport – and Winford.</p> <p>We have been instructed by our clients to make the following comments in respect of their land at Blackmoor, Langford near Churchill. Whilst we note that the Issues and Options paper is not intended to be a site specific document and indeed there will be further opportunities during the course of the new local plan process to further promote this land, we believe that the Council should be aware of its future potential for housing at this early stage in the process given the future level of housing provision needed in District as a result of the housing requirement figures stated in the Joint Strategic Plan (JSP) for the four Unitary Authorities which make up the West of England authority.</p> <p>Strategic context for new housing development in North Somerset</p> <p>Whilst the JSP has not yet been the subject of an Examination in Public (due to take place in spring / summer 2019), it nevertheless has been through a rigorous public consultation process and is well advanced, and therefore</p>	

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		<p>the policies and future distribution of intended housing is well understood. The key components within the JSP and further reiterated in the new local plan is the need for North Somerset Council to provide some 25,000 new homes in the period to 2036. The Council states that it has 13,900 dwellings as existing commitments either in the form of existing permissions or site allocations. This leaves a residual figure of 11,100 dwellings to find throughout the plan period. The vast majority of this residual figure is proposed as part of two large scale proposals at Nailsea/ Backwell (3,175), Banwell (1900) and Churchill (2675). These three proposals result either in new settlements or “bolt- ons” to existing settlements. By their very nature, the scale of proposed development is highly dependant upon huge level of new road infrastructure costs which the Council acknowledge will need to be funded from central government and clearly there is a high degree of uncertainty about such future funding levels. We have also made similar comments previously in other responses to the JSP proposals</p> <p>In addition to this uncertain future funding, such large- scale proposals will have significant lead in times and that is assuming that planning will be forthcoming in the plan period. Even for relatively minor schemes of say up to 200 dwellings the legal aspects of negotiations both CIL and Section 106 requirements post resolution to grant permission take anything between 12 and 24 months to complete. Indeed, the planning process for such complex developments will be subject to huge public opposition in those areas affected and will inevitably lead to delays in the process of such large- scale applications. All of these factors in isolation and combination will have a significant impact on the length of time that such schemes will come to fruition and we contend given the ongoing new local plan timescale and the discussion that will inevitably take place in the interim including the JSP Examination in Public and subsequent Local Plan Inquiry will result in many such large scale schemes not coming to fruition until the mid - 2020's at the earliest.</p> <p>Housing Land Supply Position</p> <p>As part of its housing land requirement each local authority area throughout England and Wales must demonstrate an ongoing 5- year housing land supply. Any authority which cannot demonstrate the required land supply, is at risk of piecemeal housing development throughout its administrative boundaries as a result of appeal decisions in favour of the housebuilding and development industry. In the case of North Somerset, the latest available information which was recently tested at appeal (June 2018 ref APP/D0121/£/3184845 land at Weston Business Park, Laney's Drove, Locking, Weston -super-Mare) where the Inspector concluded that the Council could only substantiate a 4.4-year housing land supply based on the evidence provided, and therefore allowed the appeal.</p> <p>Such development pressures will no doubt continue given this under provision and will lead, if allowed, to un planned development growth in unsustainable locations throughout North Somerset which is clearly contrary to the strategic growth policies contained within the adopted North Somerset Core Strategy and which provides the central core to the New Local Plan.</p> <p>Given the above two scenarios and the Council's apparent reluctance to undertake a strategic green belt boundary review in the northern parts of the District we foresee an ongoing under provision of housing land continuing for some considerable time with its consequences described above and we therefore contend that this initial stage in the new local plan process offers the opportunity to consider other suitable opportunities for sustainable development close to existing village settlement boundaries or non- strategic sites.</p> <p>Conclusion</p>	

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		<p>We therefore support the Councils proposals to improve the opportunity and supply the wide range of housing solutions given the ongoing inability to meet the rolling 5- year housing land supply position.</p> <p>It is clear however that we have severe reservations about the ability to bring forward the major strategic sites primarily at Nailsea/ Backwell and Churchill / Banwell given the associated level of highway infrastructure required which cannot alone be developer funded and clearly needs central government funding from the outset to have any creditable basis for kick starting new housing developments.</p> <p>Given the Councils apparent reluctance to undertake a comprehensive Green Belt review as part of an assessment to examine all potentially available sites there will be limited opportunities available to produce the numbers of housing required to meet the plan period to 2036. The Council are making certain assumptions in respect of windfall sites in their calculation but these may well diminish over the years and may not produce the numbers suggested.</p> <p>We welcome the Council's review through its Issues and Options paper to look at the wider potential options available to settlements within the rural areas. As stated, we support both Options 2 and 3 of the settlement options hierarchy.</p> <p>Finally, we wish to flag up our client's land as a site which has certain credentials in favour of future housing development and which we shall continue to promote throughout the various stages of the ongoing New local Plan 2036 process.</p>	
Kit Stokes	StokesMorgan Planning Ltd	<p>We act for a developer with an option to develop land to the east of Clevedon (adjoining Norton wood Lane).</p> <p>We attach a document explaining why we consider the site to be suitable for development should the Council consider removing land from the Green Belt.</p> <p>It is our view that the emerging Joint Spatial Plan's proposed approach for four Strategic Development Locations (SDL's) in North Somerset to be the main contributors for future growth is fundamentally flawed.</p> <p>North Somerset Council has promoted the SDL's from an early stage before analysing the environmental impacts of these options and without comparing the environmental impacts with other strategic options (i.e. the release of land from the Green Belt). The LPA has 'put the cart before the horse' i.e. confirmed the SDL options and then sought to retrofit a package of mitigation measures where clearly there are more sustainable environmental options from a transport, landscape, ecology and social perspective.</p> <p>A more pragmatic vision focused on strategic <u>and</u> non-strategic development provided in locations where existing transportation infrastructure can be improved and optimised more cost effectively – rather than a reliance on ambitious new infrastructure – will de-risk the process of enabling new strategic development and is therefore more likely to be deliverable. Furthermore, less concentrated forms of development are less likely to adversely impact valued landscapes and sensitive habitat.</p> <p>Furthermore, consultation on North Somerset Local Plan 2036 ahead of the Independent Examination of West of England Joint Spatial Plan is premature. The Inspectors have identified significant flaws in the strategic approach</p>	<p>NS Local Plan Response 2036 Sites - Norton Wood Lane Clevedon.pdf (246 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>taken to the JSP, where SDL's have been promoted without adequate consideration of environmental considerations.</p> <p>A more appropriate approach would be to set out the environmental impacts of various SDL and non-SDL options of addressing housing need in North Somerset (including Green belt release) and then adopt a balanced approach to allocating development for the most sustainable options.</p>	
Kit Stokes	StokesMorgan Planning Ltd	<p>We are instructed by Mr R, Waycott owner of the commercial land at Knightcott Road Banwell. This site is previously developed land which can accommodate upto 40 houses. The site is not in the Green Belt, is in Flood Zone 1 and is within walking distance of the village of Banwell. This land is unconstrained and could be delivered for non-strategic housing at an early stage.</p>	Banwell.JPG (172 KB)
Kit Stokes	StokesMorgan Planning Ltd	<p>We act for CMH Management Ltd who have instructed us to promote land at Cleeve for development.</p> <p>A Preliminary Masterplan is attached which shows how the site can be developed without impacting existing residential occupants would provide circa 40 houses.</p> <p>The site is in the Green Belt but surrounded by the settlement of Cleeve. The site has no environmental constraints (AONB SNCI etc) and a low density development would blend into the character of the existing settlement. The site is positioned within close proximity to the A370 and the main public transport route linking Weston-super-Mare with the Bristol conurbation.</p> <p>If land is to be released from the Green Belt, development of this scale, which help to support the local facilities (including the local public house) in the village of Cleeve should be supported.</p>	Cleeve Block Plan 40 houses.JPG (139 KB) Cleeve Aerial.JPG (119 KB)
Kit Stokes	StokesMorgan Planning Ltd	<p>We act for our clients Jedhi Ltd who are local house builders. They own a site adjoining the village of Langford as shown on the attached plan. The site is in Flood Zone 1, not in the Green Belt and is not in a Conservation Area, AONB etc. The site benefits from a full suite of archaeology, ecology, transport and tree surveys and these reports have been agreed with North Somerset Council. The site would be suitable for circa 40 houses and could be delivered without delay.</p>	Langford.png (632 KB)
Kit Stokes	StokesMorgan Planning Ltd	<p>We act for First Step Homes (Wessex) Ltd who own land at Dark Lane Backwell. The site is suitable for non-strategic housing growth. It is in an infill site in the village of Backwell opposite the primary school. If the Council considers the release of appropriate sites from the Green Belt this site should be considered as a suitable option given its accessible location and the fact that it an infill site that will not harm the openness of the Green Belt. The site will support the development of circa 40 houses.</p>	Backwell.JPG (95 KB)

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Lands Improvement		<p>Pegasus Group write on behalf of our client Lands Improvement (hereafter referred to as LI) who own land at Court House Farm, Plummers Hill, Easton-in-Gordano (the site). A Site Location Plan showing the extent of the land interest is appended to this representation.</p> <p>The site has been previously promoted by Pegasus Group as part of the West of England Joint Spatial Plan (JSP) and the North Somerset Site Allocations Plan (SAP).</p> <p>The Site is owned by LI and is located on the western edge of Easton-in-Gordano. We consider that Easton-in-Gordano should accommodate a proportionate level of growth commensurate with its role and function. There is a particularly well defined affordable housing need associated with the settlement.</p> <p>For this local need to be realised a positive approach to site identification will be required. We consider that Easton-in-Gordano and land at Court House Farm to be suitable locations for a non-strategic housing allocation.</p> <p>These representations set out the site's spatial context, responds to the questions raised in the Issues and Options document (September 2018) and the supporting draft Sustainability Appraisal.</p>	<p>Land Improvements.pdf (784 KB)</p>
Lands Improvement		<p>LAND AT COURT HOUSE FARM, EASTON-IN-GORDANO</p> <p>10.1 The site (as identified at Appendix 1) is located on the western edge of the settlement of Easton-in-Gordano. The M5 runs along the northern edge of the site and the site is located in close proximity to Junction 19 with the remainder of the northern boundary abutting Gordano services.</p> <p>10.2 The site is located beyond the defined settlement boundary and is located within the Green Belt. Although located within the Green Belt the JSP Green Belt Stage 2 Assessment concluded that the cell 77a (which includes the Court House Farm site) made:</p> <ul style="list-style-type: none"> • Limited Contribution – Checking the unrestricted sprawl; • Limited Contribution – Preventing neighbouring towns merging into one another; • Limited Contribution – Assisting in safeguarding the countryside from encroachment; • No Contribution – Preserving the setting and character of historic towns; and • Limited Contribution – Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>10.3 The construction of the M5 motorway and the built-up area of Pill has created a more defensible boundary close to the urban area resulting in a small pocket of land which no longer performs an important Green Belt function.</p> <p>10.4 The site is located within Flood Zone 1 (area of lowest risk) and has no overriding constraints to development.</p>	<p>Land Improvements.pdf (784 KB)</p>

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		<p>10.5 Although a small number of Grade II Listed Buildings are located close to the site's boundary, they are not considered to restrict the development of this site.</p> <p>10.6 The site benefits from two access points with the principal access being onto St. George's Hill. The site is near the Avon Cycleway which runs along the front of the site and near a bus stop which serves Bristol (via the X3A and X4 services) twice hourly.</p> <p>10.7 The existing evidence suggests that this site is highly suited to residential development and it is located on the edge of a sustainable settlement. The sustainability credentials of Easton-in-Gordano would be further enhanced if the train station at Portishead is delivered.</p> <p>10.8 Given that the site only makes a limited contribution to the functions of the Green Belt we consider this site is highly suited for release and allocation and assist with the very challenging housing numbers to be delivered over the plan period.</p> <p>10.9 The Site can accommodate approximately 200 dwellings and provide the identified affordable housing need as noted in section 3 of this report.</p> <p>10.10 We would welcome the opportunity to discuss the site further with North Somerset Council during the new Local Plan progressions.</p>	
M Dos Santos		Site at Portbury	207_NSC_LP_Response_Newlyn_FINAL.pdf (527 KB)
M Regan	M7 Planning Limited	<p>I have been undertaking a land assembly exercise along the new proposed by-pass route north of Sandford and Churchill and I believe I have a deliverable alternative to the suggested Garden Village.</p> <p>I am meeting a number of landowners next week who are very interested in bringing forward land to the north of Churchill Green (plan attached) for development. Through this land the first leg of the new link road can be created and funded (subject to design), connecting from Churchill School to Sandford. This would require Thatchers to provide access, which I am awaiting for feedback on, but could deliver c.1,500 plots.</p> <p>I believe that from Churchill School the link road could then continue eastwards connecting to Pudding Pie Lane (North Somerset own a parcel of land which could provide access), and releasing land predominately owned by Edwards for a further c.1,000 plots.</p> <p>Through such a scheme the housing could come forward in conjunction with the infrastructure, providing a viable new network of roads to by-pass Sandford and Churchill.</p>	Landownership Plan Sandford.docx (2.8 MB)
Mary Cradock		REPRESENTATIONS FOR LAND BETWEEN MAYFIELD FARM AND LOCKING SERVICE STATION, LOCKING MOOR ROAD, LOCKING	Mary Cradick site plan Response 18.12.07.pdf (500 KB)

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>The summary of key issues and suggested ways to address them through the Local Plan are supported. My client's site could play a role in supporting two of the suggested initiatives:</p> <ul style="list-style-type: none"> ? Identify policies and allocations to deliver the housing requirement at sustainable locations; and ? Consider policies and allocations to support local economic growth. <p>My client's site is available and would be suitable for housing or employment development.</p> <p>Page 18 - Requirement for small sites</p> <p>The consultation document rightly highlights the revised NPPF requirement that at least 10% of all sites identified for housing in Local Plans should be of 1 ha size or less. The intention is that this will help to ensure that a wider range of sites are available in a variety of locations to provide greater choice. Furthermore, sites of this scale also tend to be easier to deliver in comparison to larger, more complex sites. Accordingly, the allocation of such sites should help to ensure an increased and more consistent rate of delivery of new homes over the plan period.</p> <p>Site Merits</p> <p>My client's site is located in a sustainable location, adjacent to the village of Locking and hence capable of coming forward for development under the current policy provisions. The site is situated in an accessible location with many day to day services available within reasonable walking and cycling distance in Locking.</p> <p>The site is covered by the Strategic Gap (Policy CS19) but it is our contention that its development would be acceptable in principle on the basis that the development of the site would not harm the open and undeveloped character of the locality, would not harm the separate identity and landscape setting of Locking and would not demonstrate an uncharacteristic scale and pattern of development in this location. Furthermore, its development would not fail to respect the character and surroundings of the site and certainly would not result in any harm to the character and appearance of the countryside given its location surrounded by built form.</p> <p>My client's site as well as another in the locality have recently been tested at appeal. See refs: APP/D0121/W/18/3206517 and APP/D0121/W/18/3199616 respectively. The latter appeal relates to a site in a similar position to my client's – between the existing Locking village settlement boundary and the A371 and within the same extent of the Strategic Gap. The appeal proposal for the construction of 8 no. bungalows was allowed whereas the appeal on my client's site for 5 no. dwellings was refused. In the respective appeals, a completely contrary approach to the importance of the Strategic Gap was taken – i.e. it was given substantially more weight in my client's appeal decision, which actually post-dates the decision on the neighbouring site. An enquiry with PINS on the consistency of its decision making is currently pending.</p> <p>As a result of the allowed appeal, the Strategic Gap between Locking and the A371 will be further eroded. This new development, coupled with existing developments within the Strategic Gap area (namely the industrial estate to the east and housing/service station to the west of my client's site), substantially reduce the case for the retention of the Strategic Gap in this location. Accordingly, the extent of the Strategic Gap as defined by Policy CS19 and the accompanying Proposals Map should also be reviewed as part of the Issues and Options review of the Local Plan.</p>	

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Mead Realisations Ltd		<p>It is noted (page 19) that potential sites will be identified at the next stage of the Local Plan. Mead Realisations Ltd has interests in the following sites which should be considered as part of the preparation of the next stage of the local plan process. (see attachments for details)</p> <ul style="list-style-type: none"> • Land east of Jn 21 (Main representation plus appendix 1 and appendix 2, appendix 3) • Land at Lynchmead Farm W-s-M (Main representation plus appendix 4) • Land at Sand Road Kewstoke (This site comprises 42.27 hectares of undeveloped land adjacent to the settlement boundary of Weston super Mare. The site is identified in the SHLAA 2018 under reference HE18245 and could accommodate up to 630 dwellings. appendix 5) • St Georges railway triangle. This site comprises undeveloped land adjacent to the settlement boundary of Weston super Mare. The site is identified in the SHLAA 2018 under reference HE18119 and could accommodate approximately 53 new dwellings. A concept plan is attached at Appendix 6 illustrating how the site could be developed. • Land at Parklands, Weston super Mare . This site comprises undeveloped land adjacent to the newly established settlement boundary approved by proposals at Parklands (part of the Weston Villages) which was granted outline planning permission in 2015. Planning conditions at the site have been discharged and reserved matters details have been submitted for the first phases of development. The adopted Weston Villages SPD proposed a gap between the built edge of development and the A370. However, in light of the changing planning policy context and the need for new housing sites to be identified in the new local plan 2016-2036 development could easily be extended further north and east. New development in this location would be close to new and existing services, facilities and employment opportunities. A location plan is attached at Appendix 7. • Land Off Ebdon Road, Ebdon This site comprises approximately 0.89 hectares of undeveloped land adjacent to the settlement boundary of Weston super Mare. A location plan is attached at Appendix 8 illustrating the site edged red. The site is identified in the SHLAA 2018 as part of reference HE18127 and could accommodate around 30 dwellings. • Manor Farm, Bourton. This site comprises approximately 40 hectares of undeveloped land adjacent to the settlement boundary of Weston super Mare. A location plan is attached at Appendix 9 illustrating the site edged red. The site is identified in the SHLAA 2018 under reference HE18119 and could accommodate up to 1200 dwellings although smaller areas of the site could come forward in isolation. 	<p>Appendix 5 - Land off Sand Road, Kewstoke.pdf (734 KB) Appendix 3 - Technical Representations prepared by Vectos.pdf (693 KB) Appendix 1 - land east j21.pdf (1.2 MB) Appendix 4 - Land at Lynchmead Farm, Ebdon Road.pdf (760 KB) Appendix 6 - 54 unit St Georges.pdf (1.1 MB) Appendix 2 - Concept Document.pdf (11.1 MB) Appendix 7 - 012vi_10010C_Masterplan_1300719.pdf (1.4 MB) Appendix 9 - Manor Farm, Bourton.pdf (7.3 MB) Appendix 8 - Land off Ebdon Road.pdf (357 KB)</p>
Mr A.G		Site put forward at Flax Bourton between A370, B3130 and Old Weston Road.	<p>Rackham Planning A Gibbs.pdf (772 KB) Site Plan CB.pdf (164 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
Mr and Mrs Eyermann		<p>Please accept this letter as a representation prepared on behalf of Mr and Mrs Eyermann to North Somerset's Consultation to the Draft Local Plan 2036; Issues and Options Stage Document.</p> <p>As part of this representation, the land as outlined on the enclosed plan ref. Figure 1, is offered as a residential allocation; either in its own right or as part of a larger residential allocation.</p> <p>The land is located on the north eastern side of the A368 (Bath Road) at Langford (Coordinates 345344, 159870), with the nearest post code being BS40 5EB. The site is a gently sloping parcel of land which sits close to the settlement boundary for Langford and close to recent planning approvals for residential development. It is outside of an area considered to be at risk of flooding (Flood Risk Zone 1). The site is also outside of the Area of Outstanding Natural Beauty (AONB).</p> <p>The Draft Local Plan 2036: Issues and Options Consultation Document takes forwards the objectives of The West of England Joint Spatial Plan (WoE JSP). The WoE JSP sets out a prospectus for sustainable growth that will help the area meet its housing and transport needs for the next twenty years. It will guide the planning strategies for planning authorities Bristol City, North Somerset, Bath and North East Somerset and South Gloucestershire Councils.</p> <p>The JSP has been submitted to the Planning Inspectorate and it is anticipated it will be examined in Autumn/Winter 2018. It is expected to be adopted in 2019. Given its relatively advanced stage towards adoption, it is the guiding strategy for the next North Somerset Local Plan 2036.</p> <p>The 'Issues and Options Document' informs North Somerset's consultation. It proposes a new garden village centrally between Langford and Congresbury which is being referred to as 'Mendip Spring Garden'. The consequence of developing a new 'garden village' close by with thousands of new homes being built is that there will also be an important drive to secure improvements to existing highway infrastructure as well as to build new transport and green infrastructure links.</p> <p>The 'Issues and Options Consultation' seeks to establish where the residential allocations should be made to make best use of the new infrastructure improvements. The current objective of North Somerset Council to secure the vast proportion of new development in this general area by providing a new garden village to the north of Langford and Churchill. There has been significant opposition to this from local residents. Whether this remains the strategy throughout the development of the Local Plan is unknown.</p> <p>Considering the uncertainty and also that North Somerset have recently approved residential developments on land to the south of Langford (refs. 17/P/1200/O; 15/P/1313/O), if further development were to take place to the south of these developments, then there is a swathe of land that is likely to come forward and Mr and Mrs Eyermann's land adjoins this land and would be a natural inclusion to this land.</p> <p>Mr and Mrs Eyermann would like to respectfully invite the Authority to consider the site as outlined within the red line on the enclosed plan ref. Figure 1 to be incorporated as / within a residential allocation in the next North Somerset Local Plan 2036.</p>	<p>Land at Bath Road, Langford - LP Issues and Options Rep.pdf (532 KB)</p>
Mr C Booy	-	<p>Land to the North-West of Portbury</p>	<p>Mr C Booy , via JLL, Portbury Reprs.pdf (949 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>North Somerset Council (NSC) is currently preparing a new Local Plan for its administrative area. As part of this process, the Council has asked developers, landowners and members of the public to comment on the 'Issues and Options' Document. The Issues and Options Document presents a number of matters to be commented upon in order to allow for the successful update of the existing Local Plan.</p> <p>This representation has been prepared by JLL on behalf of our client, Mr C Booy, to promote land to the rear of Station Road, Portbury for residential-led development. The mix of uses would comprise predominantly residential with potential for some local level employment activity. This representation should be read in conjunction with the Site Plan provided, which is attached to this submission. A letter with concern to flood risk matters is also appended which sets out the situation in this regard in more detail.</p> <p>It is acknowledged that the new plan is in its early stages and as such the Issues and Options Document does not contain detailed policies or site allocations. However, site allocations will be taken into account at a later date, following from the Issues and Options Consultation. The purpose of this representation is to therefore provide comment on the relevant questions posed within the consultation document, to allow for the future allocation of the proposed site. To assist in the consideration of this, details of the site have been provided to demonstrate its suitability in association with the relevant questions of the consultation document. The relevant questions are considered later on in this letter.</p> <p>General</p> <p>The subject site comprises circa 1.6 hectares of hardstanding, structures and kept grassland. To be more specific, the site has some built development in the form of stables and associated grounds to the south. The north of the site consists of kept grassland and a strong boundary made up of mature trees and hedges. It is therefore a partially brownfield/partially greenfield site.</p> <p>It is considered that the site can accommodate residential development, whilst supporting a level of local employment use. The size of the site means that some level of affordable housing provision is expected to be achievable, subject to details. Provision can also be made for local play and amenity space within the landholdings. The full extent of the development potential is to be confirmed following site allocation at a later date.</p> <p>The site is located to the north west of the settlement of Portbury, accessed off Station Road. The village benefits from being in very close proximity to the M5 motorway and Portishead, near the Royal Portbury Dock. The A369 is within easy reach of the village, linking to Bristol and Portishead</p> <p>In terms of facilities, St. Mary's Primary School is located within Portbury and the village also benefits from transport to Gordano school in Portishead. There is also a nursery, a public house and a church, to name a few. Due to the size of the site and its location, it should be considered to be proportional growth in association with the village of Portbury.</p> <p>The existing Local Plan proposals map for the area confirms that the site is located within the Green Belt, but is not subject to any other designations.</p> <p>Accessibility</p> <p>As confirmed above, pedestrian and vehicular access to the site is gained via a number of points off Station Road, one of the arterial routes through Portbury. As Portbury benefits from school provision and proximity to Portishead,</p>	

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		<p>there are a range of public transport nodes a short distance from the site. There are bus stops located on Mill Lane and Brittan Place, a short walk to the south and Station Road and Portbury Hundred, a short walk to the north.</p> <p>More notably, the sites proximity to the M5 and A369 ensures good connectivity options to surrounding infrastructure by a range of transport means. The site is therefore considered to be accessible. When this is considered alongside the developed nature of some of the site, the rationale for future development is positive.</p> <p>Environmental</p> <p>A search of the EA Flood Map reveals that the site is located in flood zone 3, an area with a high probability of flooding. Under normal circumstances the site would be disregarded, particularly with concern to vulnerable use proposals. A flood risk assessment is therefore pertinent to establishing the development potential of the site.</p> <p>Despite the above, information available indicates that the flood zone 3 designation may be incorrect. As a result, Calibro have prepared a note in support of this representation which sets out relevant context, noting that the topography of the site indicates that the current EA flood mapping data may be incorrect. JLL would therefore suggest that the flood maps should, at this stage, not be relied on to assess the future development potential of the land. Subject to the EA model review (refer to Calibro letter for details) and discussions with NSC the landowner will commission further work to clarify the true extent of the flood zone.</p> <p>Notwithstanding the above, there are a number of positive environmental considerations summarised below:</p> <ul style="list-style-type: none"> ◦ • Part of the site comprises of previously developed land; • • Not in agricultural use; • • No ecological designations; and • • No significant potential impacts on heritage or landscape character. <p>The history of the site together with its proximity to the existing settlement means that it benefits from a landscape character suitable for residential uses. It is considered that the development of the site will not detract from the wider area character as it will successfully merge with the rest of the village. In addition, given that the land is maintained and encased by a substantial boundary treatment, its character is already somewhat urban.</p> <p>Following from the above, the site is surrounded by mature trees and hedgerows and as a result the development of the site would essentially 'round-off' the village. Given the boundary treatment in place, any future development would not come across disjointed and therefore not lead to further development within its surrounds. Please see the image below (Diagram 1 that assists in giving this point perspective.</p> <p>Site Context</p> <p>The good transport links available in the region ensure that access to areas of high employment is easily achievable, enhancing employment opportunities in these settlements.</p> <p>Deliverability</p>	

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		<p>The site is owned by two individuals who are willing to work with housebuilders / developers to facilitate the delivery of the site, if allocated.</p> <p>Our initial review indicates that the development of the site would be financially viable and discussions with residential agents have indicated that there would be interest from developers in progressing the site. Further information can be provided on these points as required.</p> <p>Development on the site could begin the moment planning permission was granted. As such, it is reasonable to suggest that development would begin on the site comfortably within 5 years of it being allocated and sooner if the planning process is undertaken in a positive and engaging way.</p> <p>The Issues and Options Document covered below appreciates that small scale sites are easier to deliver and greatly assist with overall delivery rates.</p>	
Mr S Lawley		<p>Please accept this letter as a representation prepared on behalf of Mr S Lawley to North Somerset's Consultation to the Draft Local Plan 2036; Issues and Options Stage Document.</p> <p>As part of this representation, the land as outlined as Areas 1 and 2 on the enclosed plan ref. 5100- PL-101, is offered for residential development.</p> <p>The land is located at Chestnut Farm, North End Road, Yatton, BS49 4AS.</p> <p>The two areas of land are put forward separately so that the Authority can consider their individual merits.</p> <p>Area 1:</p> <p>Area 1 is a small parcel of land with the potential to secure circa 7+ dwellings. It is entirely surrounded by existing / approved residential development.</p> <p>If it remained undeveloped, it would become a 'pocket' of undeveloped agricultural land with little benefit to the wider agricultural supply of land or open countryside and of little direct benefit to the new community that will establish around it.</p> <p>The site has a good vehicular access onto North End Road and is also adjacent the allocation of the proposed new primary school. It is very well connected for local services and facilities associated with the future development of adjacent lands. It does not form part of an area of environmental protection and is not within an area recognised as being at risk of flooding.</p>	<p>5100-PL-101-Location Plan.pdf (302 KB)</p> <p>Land at Chestnut Farm - LP Issues and Options Rep 05.12.2018.pdf (530 KB)</p>

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		<p>Its development would have little impacts on the wider rural character and appearance of the countryside due to its position being surrounded by residential properties.</p> <p>This area of land will essentially adjoin the new settlement boundary for Yatton if it is not indeed enclosed within it and as such it should not be discounted from the Issues and options review.</p> <p>It also falls within the area potentially available for development in the ‘Yatton Neighbourhood Plan’</p> <p>Area 2:</p> <p>Area 2 is a larger parcel of land that has the potential to secure a further 10 – 15 dwellings. It is also within Flood Zone 1; an area at least risk of flooding and has vehicular access via Area 1 to North End Road.</p> <p>This land has not been identified as either potentially favourable or unfavourable in the Issues and Options Consultation. This area of land is also excluded from the ‘Strategic Gap’ of the Yatton Neighbourhood Plan which sets a boundary limit at which no further development should take place (see Page 15 on the link to the Yatton Neighbourhood Plan above).</p> <p>The Draft Local Plan 2036: Issues and Options Consultation Document takes forwards the objectives of The West of England Joint Spatial Plan (WoE JSP).</p> <p>The WoE JSP sets out a prospectus for sustainable growth that will help the area meet its housing and transport needs for the next twenty years. It will guide the planning strategies for planning authorities Bristol City, North Somerset, Bath and North East Somerset and South Gloucestershire Councils.</p> <p>The JSP has been submitted to the Planning Inspectorate and it is anticipated it will be examined in</p>	

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		<p>Autumn/Winter 2018. It is expected to be adopted in 2019. Given its relatively advanced stage towards adoption, it is the guiding strategy for the next North Somerset Local Plan 2036.</p> <p>The 2 sites the subject of this representation would provide a valuable addition for residential development and securing infrastructure improvements and providing linked sustainable access routes, if it were allocated for housing.</p> <p>Mr Lawley would like to respectfully invite the Authority to consider the site as outlined within the red line on the enclosed plan ref. 5100-PL-101 to be incorporated within the next North Somerset Local Plan 2036 for residential development.</p>	
Newcombe Estates Company Limited	Boyer planning	<p>In support of our representations, we set out below evidence of such wider, non-strategic development opportunities which exist within the North Somerset area. In doing so, this demonstrates that with a sufficiently positive and robust strategic framework set out within the JSP, such wider opportunities for development can be realised. This will facilitate the delivery of a broad range of site options within North Somerset and the wider JSP area to provide choice, both in terms of location and product, but critically, providing greater flexibility in the supply over the Plan period, thereby reducing reliance upon SDLs.</p> <p>Land to the east of Portbury</p> <p>4.9 Land to the east of Portbury (Appendix 1) provides the opportunity to deliver a non-strategic site (c. 75-100 dwellings) that would benefit from and support existing services and facilities, including St Mary's CoE Primary School associated with the settlement of Portbury.</p> <p>4.10 This site is an edge of settlement site that benefits from good access to the strategic road network, with Junction 19 of the M5 Motorway accessed to the east via the A369 (Martcombe Road). The M5 borders the north of the site with existing residential development along Priory Road to the west. To the south runs the High Street, with playing fields and St Mary's CoE Primary School located to the south west of the site. The site is therefore physically contained by hard infrastructure and built development on three sides, with playing fields and open fields extending eastwards and St Mary's Church and Cemetery adjacent to the eastern boundary of the site.</p> <p>4.11 An indicative masterplan has been prepared which demonstrates how this site can be delivered in a manner that provides for a logical and coherent edge of settlement development at a scale that is proportionate to the existing settlement of Portbury.</p> <p>4.12 Development at this location will retain existing sports pitches, whilst providing additional amenity provision in terms of useable open space, alongside play areas and allotment provision. The indicative masterplan has been prepared to ensure that development proposals have due regard to the existing heritage assets, specifically the 12th Century St Mary's Church and Cemetery.</p>	

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		<p>4.13 The entire Portbury settlement is washed over by Green Belt, and consequently, the current adopted North Somerset Core Strategy makes no provision for growth at Portbury. However, through the JSP and North Somerset Local Plan 2036, set within the context of our representations presented above, this site provides a genuine opportunity to deliver a sustainable pattern of development that would support a spatial strategy which delivers a range of sites, both in terms of size and locations. The promotion of this site should also be considered in the context of NPPF paragraph 138 and the clear direction that when preparing plans, local authorities should consider areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt as well as locations beyond the outer Green Belt.</p> <p>4.14 We set out below a summary of the five purposes of the Green Belt and the site's contribution to it.</p> <p>To check the unrestricted sprawl of large built-up areas</p> <p>The development site provides a logical and coherent extension to Portbury that is not out of scale with the existing settlement. The development site is subject to significant urban influences which means that the site is enclosed and divorced from the countryside beyond. This includes the M5 Motorway to the north, the High Street to the South and the existing Portbury settlement to the east.</p> <p>Limited contribution.</p> <p>To prevent neighbouring towns merging into one another</p> <p>Development to the east of Portbury will not reduce the separation of Portbury to other settlements. The site is physically contained by existing road infrastructure to the east such that there is no impact on neighbouring settlements.</p> <p>Limited contribution.</p> <p>To assist in safeguarding the countryside from encroachment</p> <p>Given the physically constrained nature of the site, as result of the existing road network, the site does not result in any encroachment into the wider countryside.</p> <p>Moderate contribution.</p> <p>To preserve the setting and special character of historic towns</p> <p>Portbury is not subject to any specific Conservation Area designations. As demonstrated in the indicative masterplan, the St Mary's Church Listed building and its setting can be protected such that it does not result in harm to this asset.</p> <p>Limited contribution.</p> <p>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p>	

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		<p>The site is promoted as a positive and deliverable sustainable development opportunity as part of a wider development strategy which includes, brownfield sites, large scale Greenfield Strategic Allocations and non-strategic sites.</p> <p>Limited contribution.</p> <p>4.15 For reasons set out above, the principal constraint associated with this site relates to its location within the Green Belt. This high level summary of the performance of the site in terms of its contribution to the purposes of the Green Belt demonstrates that this site could be developed without undermining the overall function of the Green Belt, specifically as it does not make a significant contribution to any of the five purposes as defined at paragraph 134 of the NPPF.</p> <p>4.16 The JSP has an important function, in terms of providing the direction to North Somerset Local Plan 2036, and in this regard it should provide a clear direction that Green Belt locations should not be excluded from assessment to deliver non-strategic growth through North Somerset Local Plan.</p> <p>4.17 In this regard we would welcome the opportunity to work closely with North Somerset Council, through the JSP and Local Plan process, to demonstrate how this site can provide a positive, deliverable and sustainable non-strategic site option.</p> <p>4.18 The North Somerset SHLAA 2018 identifies the site, SHLAA reference HE18157, as being within Strategic Flood Risk Assessment (SFRA) fluvial flood zone 3b. The SFRA states that all areas in flood zone 3 should be considered as functional floodplain (3b) until an appropriate FRA demonstrates otherwise. The SHLAA Part 1 Assessment discounts sites entirely within flood zone 3b. However, the 2008 North Somerset SFRA Level 1 states that <i>“If the SFRA indicates that a property or possible area for development is within or adjacent to a flood risk area, than a detailed Flood Risk Assessment (FRA) will be required to assess the site before any decisions can be made”</i>. <i>Nevertheless, the SHLAA Part 1 assessment immediately discounts sites stated to be within flood zone 3b, without further assessment.</i></p> <p>4.19 It is considered that the 2018 SHLAA has incorrectly concluded that the site is located within Flood Zone 3. The Environment Agency Flood Map for Planning identifies the site as entirely being within flood zone 1.</p> <p>4.20 The EA Map shows areas of flood zone 2 and flood zone 3 to the adjacent north west, but these do fall within the boundary of the site. To the north of the M5 motorway, the EA Flood Map shows large areas of Flood Zone 3, but that are benefiting from flood defences.</p> <p>4.21 Duplicating the EA Flood Map, North Somerset’s Planning Map also identifies the entirety of the site as being within flood zone 1.</p> <p>4.22 The Planning Map shows some small areas of Surface Water, to the north and north east corner, and towards the south of the site, indicating where surface water flooding could occur as a result of rainfall (at 1% chance of it happening in any year).</p> <p>4.23 The 2018 SHLAA should therefore be updated to ensure that it is based on an accurate and reliable assessment as to the actual flood risk associated with this site.</p>	

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		<p>Land adjacent to Long Ashton Road (A370)</p> <p>4.24 This site comprises a triangular piece of land which is enclosed by Ashton Road (A370) along its southern boundary and the B3128 along its western, northern and eastern flanks. The site is located at the eastern edge of the North Somerset administrative boundary, adjacent to the boundary of Bristol City. The site provides opportunities for future development either as part of a large urban extension to the south-west of Bristol, or as an expansion of existing non-residential development, complimenting existing employment, retail and leisure land uses to the south of the A370. The Long Ashton Park & Ride facility is located to the south of the site, accessed via the B3128.</p> <p>4.25 The recently completed South Bristol Link Road provides access from the A370 to the west of the site, through to Hengrove Park to the south of Bristol. This new Link Road also provides direct links to Bristol Airport.</p> <p>4.26 The site is considered to be very well located to access the Metrobus Network, which is a cornerstone of the wider Bristol Transport Strategy. The network extends along the newly completed Link Road and the completion of the Ashton Vale to Temple Meads Metrobus Route will provide access from the Park and Ride direct into the centre of Bristol. In location terms, this site would be entirely consistent with the recognition within the submitted JSP that <i>“sustainability is closely related to proximity and accessibility to services and facilities, particularly in Bristol, Bath and Weston-Super-Mare” (chapter 3).</i></p> <p>4.27 The site is located within the designated Green Belt and as such has been excluded from consideration as part of a broad location of growth as a Strategic Development Location within the JSP. This should not, however, exclude the consideration of this site, through Green Belt release in North Somerset Local Plan, based on an objective assessment of its sustainability credentials balanced against its contribution to the purposes of the Green Belt.</p> <p>4.28 The site provides a genuine development opportunity to deliver residential development as part of a wider urban extension to the south west of Bristol, or an employment-led development that compliments existing land uses in close proximity to the site.</p> <p>4.29 In this regard we would welcome the opportunity to work closely with North Somerset Council, through the JSP and Local Plan process, to demonstrate how this site can provide a positive, deliverable and sustainable non-strategic site option.</p>	
Newland Homes		<p>These representations set out the site’s context and history, consider the implications of the emerging JSP for North Somerset more generally and then finally set out our detailed response to the questions and issues raised in the Issues and Option Plan, focusing exclusively on Chapter 3 ‘Local Housing Growth’ (Pages 18-27).</p> <p>SITE CONTEXT AND PLANNING HISTORY</p> <p>2.1 The site comprises partly previously developed land and a greenfield on the eastern edge of the settlement of Claverham. The settlement is identified by the North Somerset Core Strategy as an Infill Village (Policy CS33: Infill Villages, smaller settlements and countryside).</p>	<p>Newland Homes UTAs CLaverham.pdf (2.0 MB)</p>

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		<p>2.2 The site covers an area of approximately 5.75 hectares and is accessed from Bishops Road. It is situated outside of the settlement boundary but is not within the Green Belt.</p> <p>2.3 The site was formerly owned by UTAS Claverham Ltd, part of UTC Aerospace Systems, which operated its business from industrial premises within the central part of the site. The land holding also includes the field to the north ('the northern field'), and a further parcel of land comprising the 'May Day Field' and the village hall to the south. The use of the factory ceased in September 2017. Newland Homes purchased the whole site in early 2018. The Village Hall, including coffee shop/café, pub and post office, continues to be leased to the Parish and remains in operation and is the heartbeat of the community</p> <p>2.4 This central part of the site is allocated for residential or mixed residential and employment development under Policy D3 (site PS1) of the Claverham Neighbourhood Plan.</p> <p>2.5 Newland Homes submitted an application for full planning permission (ref. 18/P/3659/FUL) and listed building consent (ref. 18/P/3660/LBC) for the development of the central part of the site only for 77 no. dwellings in July 2018.</p> <p>The application has received support from Yatton Parish Council due to its adherence to the design and conservation principles established by policy D3, and the retention of Claverham Village Hall and May Day Field Open Space which are identified within the CNP as important community assets.</p> <p>2.6 Although the proposed development is limited to 77 no. dwellings within the previously developed part of the UTAS site, the additional land to the north represents an excellent opportunity for a second phase of development in order to assist meeting housing need across North Somerset in a sustainable settlement. The northern field development would represent a logical extension to the current proposal, which is equally well related to the settlement and has limited landscape Newland Homes impact due to strong green buffer screening. An appraisal of development potential of the northern field is attached at Appendix 3.</p> <p>APPENDIX 3: NORTHERN FIELD PLANNING APPRAISAL</p> <p>2.7 Throughout the remainder of this representation, we set out our justification as to why the new Local Plan must respond to non-strategic development opportunities such as this by reviewing settlement hierarchies and expanding settlement boundaries in sustainable locations like Claverham such that spatial policies do not artificially constrain appropriate housing delivery.</p> <p>JSP Context</p> <p>2.8 The North Somerset Local Plan will take forward the housing requirement identified within the JSP which is currently at examination. The JSP also identifies a series of Strategic Development Locations (SDLs) from which Local Plan Allocations will be formed.</p> <p>2.9 The Issues and Options document is based upon the level of growth envisaged as per the submission version of the JSP. We have concerns in relation to both the total quantum of development and the suitability of several of the SDLs to deliver the numbers envisaged. This is primarily because of the associated infrastructure requirements of those SDLs and the implications this will have for their timely delivery.</p>	

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		<p>JSP Housing Requirement</p> <p>2.10 Pegasus Group has undertaken its own analysis of the Objectively Assessed Need for the JSP plan area. The Standard Methodology for the calculation of a minimum housing need figure would amount to 116,000 dwellings for the period 2016-2036 for the four JSP Authorities.</p> <p>2.11 Such a figure would represent the minimum requirement, which is already significantly in excess of that being promoted by the JSP authorities and this minimum would not take account of affordable housing needs and employment forecasts within the JSP area.</p> <p>2.12 Setting this aside for the time being, it is particularly telling that despite having sufficient time to do so the JSP Authorities have not undertaken an update to the SHMA to reflect the latest population and household projections which were published in July 2016.</p> <p>2.13 Further, they have sought to rely, within the Housing Topic Paper, on a figure of 88,400 as a household projection for the area simply because they feel the CLG projection is broadly accurate without then taking account of good reasons to divert from this figure (such as affordable housing needs).</p> <p>2.14 We also consider that the Councils have failed to undertake any detailed economic analysis of what may be needed and which would include taking due account of market signals. In our opinion, this results in a suppression of household growth forecasts.</p> <p>2.15 Furthermore, the JSP as currently drafted only seeks to meet approximately 75% of the total affordable housing need. The Councils provide an OAN calculation for the affordable housing element but not for the market or total OAN figure and the absence of these calculations is particularly noteworthy.</p> <p>2.16 Taking the above factors into account we believe there is strong justification for increasing the housing requirement figure, the starting point for which would see an increase to at least 116,000 dwellings. In all likelihood, we believe that a final figure would be in the order of 125,000 which represents a significant increase which needs to be addressed appropriately through the JSP strategy.</p> <p>JSP and SDL's</p> <p>2.17 The JSP, as currently, drafted makes four strategic allocations in North Somerset, at Backwell (700 dwellings), Banwell (1,900 dwellings), Churchill (2,675 dwellings) and Nailsea (2,575 dwellings). Combined, these SDLs will deliver a total of 7,850 dwellings.</p> <p>2.18 Particularly in the case of Backwell, Banwell and Churchill these are very large allocations when compared to the existing character of the locale. At this stage, very limited detail is provided by the JSP as to what exact land parcels these sites consist of (only high-level detail is provided within the Development Locations Template document) but it is reasonable to assume that the rate of delivery of these will be slow during the first half of the plan period. This is primarily due to the long lead in times that are needed for sites of this scale due to the need to deliver the requisite infrastructure to ensure such growth is both coordinated (including sourcing considerable funding and assembly of land through compulsory purchase) and then adequately delivered. As such there is a heavy reliance on these being delivered quickly given the proportion of the overall total that they make over and above existing commitments.</p>	

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		<p>2.19 There may well be significant deliverability issues at any one or more of those locations. Should this be the case, there appears to be little consideration for alternatives. We believe that a greater role could be played by non-strategic sites to firstly help bridge the shortfall in the overall housing need but secondly to also provide flexibility within the system to ensure that there is a 'Plan B' which allows reasonable delivery rates with the real significant numbers from the strategic sites likely only to be borne out during the latter half of the Plan period given the time that such sites take to deliver.</p> <p>2.20 A combination of an increased housing requirement coupled with slow-delivering strategic development locations (which may never come forward), means that the Council will need to identify a greater proportion of non-strategic sites to help compensate.</p> <p>2.21 All four WoE Authorities (including North Somerset) also need to be mindful of the requirements of the Housing Delivery Test (which requires consistent delivery over a three-year period). The reliance on large strategic sites to deliver the majority of dwellings over the plan period means that a key consideration in the assessment of sites identified at non-strategic locations will be their ability to deliver homes over the early years of the plan period.</p> <p>Chapter 3: Local Housing Growth</p> <p>3.2 We note that, as currently drafted, the Issues and Options document seeks to take forward the figures which are set out within the emerging West of England Joint Spatial Strategy (JSP). Examination hearings are scheduled for May 2019 and one of the early sessions will be around the overall housing requirement for the region before moving on to consider some of the identified Strategic Development Locations (SDLs).</p> <p>3.3 We consider it likely that there will be changes to both for the following reasons:</p> <p>i. the overall housing requirement is too low and does not take full account of the affordable housing need for the region; and</p> <p>ii. several of the strategic development locations are not deliverable without significant funding for infrastructure.</p> <p>3.4 As a result, it is our opinion that there will be a need to deliver in excess of the 1,000-dwelling non-strategic growth allotment currently made for North Somerset. We agree that this level of growth should be steered to the most sustainable settlements within the District but acknowledge that the current Issues and Options document does not indicate where the Council intends to meet these needs.</p>	
Newland Homes	.	<p>Land South of William Daws Close (SHLAA Ref: HE18358)</p> <p>4.1.5 The site comprises approximately 2.8 hectares of undeveloped land (two fields) on the western edge of Banwell and is located directly adjacent to the settlement boundary. As can be seen from the Location Plan at Appendix 1 the site is bound by residential development on three sides. Importantly</p>	<p>Walsingham Appendix 1.pdf (215 KB) Walsingham appendix 5.pdf (3.5 MB) Walsingham Appendix 3.pdf (575 KB) Walsingham Appendix 2 - NSC Pre-Application Report.pdf (220 KB) Walsingham appendix 4.pdf (362 KB) Walsingham Issues and Options representations Final 6.12.18.pdf (188 KB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>the site does not fall within any statutory landscape designations and is located in Flood Zone 1. The entire site is available now and there are no insurmountable constraints to development.</p> <p>4.1.6 Notably the site has been assessed in the SHLAA 2018 (Ref: Site HE18358). The site has previously been promoted for development in the consultations on the Site Allocations DPD (now adopted).</p> <p>4.1.7 The whole site is located on land assessed as 'medium landscape sensitivity' in the Landscape Sensitivity Assessment 2018 compared with other land around Banwell which is predominantly 'high sensitivity' (i.e. if developed for housing could result in substantial harm on the landscape). At paragraph 6.3.9 it states:</p> <p>'The two fields located to the south-west of Banwell, surrounded on all three sides by development, are of medium sensitivity, provided that any development is sympathetically designed with surrounding development and landscape mitigation planting is used to provide a buffer to land to the west'</p> <p>4.1.8 This site is identified as having 'less likely' development potential in the SHLAA 2018 (Ref: HE18358). We question the identification of the site as less likely as the site represents a suitable opportunity for development, although on page 4 of the SHLAA it notes:</p> <p>'The overall finding is that identifying sufficient suitable sites within North Somerset to meet the dwelling requirements emerging through the JSP is going to be extremely challenging and will require the consideration of a range of complex sites identified as having 'less likely' potential.'</p> <p>4.1.9 Therefore, while we question the site's assessment as 'less likely' it is still considered these sites can make an important contribution to the housing supply in North Somerset. We note the site located further west (SHLAA Ref: HE1898) has also been identified as a 'less likely' site. However, in comparison this site is located on land assessed as 'high landscape sensitivity' in the Landscape Assessment 2018.</p> <p>4.1.10 A Context Plan is included at Appendix 4 and shows the Newland Homes site in the context of the village as a whole. It is within easy walking distance of both the Co-op on the Knightcott Road (390 metres) and the village centre on West Street (1000 metres) where a number of services and facilities are located (primary school, Post Office, pharmacy, takeaway etc). The site is also well served by public transport, with the two nearby bus stops (located in front of the Co-op) providing access to a number of destinations including Weston-super-Mare and Wells.</p> <p>4.1.11 The site has been subject to pre-application advice from North Somerset for a scheme of around 25 dwellings on part of the site (the eastern field), and a scheme of around 58 dwellings on the whole site. The pre-application report concluded that a development of around 25 dwellings on the site would be acceptable in principle as it would comply with Policy CS32 of the Core Strategy subject to addressing detailed criteria (attached at Appendix 2).</p> <p>Planning Application</p>	

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>4.1.12 A planning application was submitted for up to 26 dwellings on 25th May 2018 on the eastern field (LPA Ref: 18/P/3334/OUT) which is currently under consider by North Somerset. The proposals demonstrate how development could proceed and are supported by a range of technical studies confirming that development is acceptable. This includes a Landscape and Visual Impact Assessment (LVIA), Ecological Appraisal / Phase 2 surveys, and a Transport Statement.</p> <p>4.1.13 The application is supported by an Illustrative Planning Layout (attached at Appendix 3) which shows how a scheme of 26 dwellings, ranging in size to provide a mixed and balanced development, could be accommodated. The mix shown on the Illustrative Planning Layout includes provision of 30% affordable housing. The layout includes landscape mitigation measures along with buffers to existing hedgerows on site.</p> <p>4.1.14 The application has not received any technical objections in relation to landscape, heritage, transport, drainage matters. Further bat surveys are being completed in November and December 2018 in response to feedback received from the Council's Ecology Officer but overall the planning application is considered to be at an advanced stage.</p> <p>Additional Land</p> <p>4.1.15 Newland Homes also control land further west as identified on the site location plan not currently subject to a planning application but shown in the SHLAA 2018 (the western field). This land is also available for development.</p> <p>4.1.16 Landscape and visual assessment work undertaken, by a chartered landscape architect, to date has found that the site does have capacity to accommodate sensitively designed residential development and any effects on the landscape can be mitigated. An Ecological Appraisal and</p> <p>Phase ecology 2 surveys have also been undertaken on this land. Reasonable and proportionate bat mitigation and enhancement provisions could be made by retaining, managing and enhancing hedges and appropriate landscape mitigation planting could be provided. Development of this part of the site represents an opportunity to round off the existing settlement whilst maintaining the open gap between Banwell and Knightcott.</p> <p>4.1.17 Proposals to develop both the eastern and western fields for residential development were presented as an option in the pre-application submission to the Council. The sketch layout submitted with the pre-application submission shows how a scheme of around 58 dwellings could be accommodated on the whole site (and is attached for reference at Appendix 5). The response from the Council is included in the pre-application report attached at Appendix 2.</p>	
Nigel Bennett (Magenta)	Magenta Planning	Regarding the options for adjusting settlement boundaries, option 1 to adjust boundaries to include new allocations and retain current policy which allows sites to come forward adjacent to a boundary is favoured, as the more pragmatic and flexible solution of the two.	

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		<p>As referred to earlier however, the review should also take the opportunity of considering the extent and appropriateness of the washed over settlements (infill villages) within the Green Belt. This should include an assessment of the contribution of these settlements to Green Belt openness, noting the Government's advice at paragraph 140 of the NPPF, which states:-</p> <p>'If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation areas or normal development management policies, and the village should be excluded from the Green Belt '.</p> <p>In respect of Cleeve, we would be interested in reviewing your assessment at the appropriate time, as we are not convinced that its inclusion within the Green Belt is justified on grounds of its 'open character'. As such, there may be scope to simply inset the village but with its boundaries extended as promoted to include the site at No3 Main Road.</p>	
Pegasus (D Millward)	Pegasus Group	<p>Where will the non-strategic sites be and settlement boundaries? (page 19)</p> <p>2.16 The Council are not currently making reference to specific sites at this point but do suggest that those shown on the Council's latest Strategic Housing Land Availability Assessment (2018) give a strong indication of preference.</p> <p>2.17 Our client's land has not been promoted previously, albeit it would have been released as part of the large Ashton Vale development should that have come forward.</p> <p>2.18 The site is currently located within the Green Belt but is contained by the relatively recently completed South Bristol Link Road. The site performs poorly in Green Belt terms and the Council are actively considering its release (see page 15) in conjunction with land within Bristol City Council's administrative boundary.</p> <p>2.19 We welcome the consideration of this land's release from the Green Belt and set out the reasons why we feel this should be pursued by the Council in section 3 of these representations.</p>	
Pegasus (D Millward)	Pegasus Group	<p>LAND OFF COLLITERS WAY, HIGHRIDGE</p> <p>As stated above, Land Off Colliters Way, Highridge is located on the southwest edge of Bristol. Barratt Homes have an interest in land in this area as shown on the below plan. The wider site (i.e. all remaining undeveloped land contained by Colliters Way, Bridgwater Road and the built-up area of Bristol) is controlled by Wring Group and Taylor Wimpey.</p> <p>The land controlled by Barratt and Wring falls within the administrative boundary of North Somerset, whilst the land controlled by Taylor Wimpey falls within the administrative boundary of Bristol City Council.</p> <p>The site is in the Green Belt but is contained by the South Bristol Link Road which has had the effect of significantly reducing its effectiveness in Green belt terms.</p>	

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		<p>Furthermore, the delivery of the South Bristol Link Road (SBLR) has created a new defensible and logical boundary to which the Green Belt could be extended and secured for the longer term.</p> <p>This, coupled with the sustainability credentials of the site and its capacity to deliver c. 220 dwellings (alongside other land within the wider cell) to help deliver the 1,000 dwellings required by the JSP, makes the site an extremely strong contender for allocation in the new local plan.</p> <p>The key headline benefits of the site and how it could be developed are summarised in the promotional document appended to these representations (Appendix 2).</p> <p>These representations will elaborate on some of the points raised within that document and illustrate that there are no technical barriers to delivery.</p> <p>Benefits</p> <p>Again, we would refer you to the promotional document which accompanies these representations as to the relative merits of the site in sustainability terms but the key headlines from the document are set out below:</p> <ul style="list-style-type: none"> • Delivery of up to 400 dwellings (c. 275 within North Somerset's boundary); • Substantial gains for social infrastructure; • Highly sustainable location with good access to existing and future transport connections (e.g. Long Ashton Park and Ride, Metrobus M1 extension along the South Bristol Link Road etc); • Good access to facilities and services in the locality and the extensive services and facilities within Bristol City Centre; • Technical Transport, Heritage, Landscape, Ecological and Drainage work undertaken has revealed no significant constraints to development; • Deliverable promptly within short timescales due to the backing by major housebuilders. <p>Summary</p> <p>We consider that exceptional circumstances will be found to justify the site's removal from the Green Belt. The site makes a limited contribution to the Green Belt following delivery of the South Bristol Link Road.</p> <p>The development of the site will make a meaningful contribution to delivering the non-strategic growth required by the JSP and relieve pressure on less sustainable settlements outside of the Green Belt to deliver this requirement.</p> <p>The site is in a highly sustainable location with excellent access to public transport connections, services and facilities within Bristol and the wider area.</p>	

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Pegasus (D Millward)	Pegasus Group	<p>Barratt Homes (Bristol) have a specific land interest at the site known as 'Land Off Colliters Way, Highridge Bristol'. The site sits on the southwest edge of Bristol which is now contained by the South Bristol Link Road. A site location plan is attached at Appendix 1.</p> <p>In support of this land, a promotional document has also been prepared by Pegasus Group on behalf of Barratt Homes which sets out the key headline benefits of the site as a whole and considers how the site could be developed, should it be released from the Green Belt. This document has also been appended to these representations.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>A sustainable mixed use extension to Portishead, which would include homes, jobs, open space, a primary school and a local centre and support for rail and highway improvements should also be tested. The opportunity for this exists on land south east of Portishead controlled by Persimmon Homes Severn Valley to achieve this. In addition this land also provides the opportunity to accommodate a new station and car park as a far more cost effective developer and landowner supported solution than the much delayed MetroWest proposal should this prove to be unviable and ultimately undeliverable.</p>	E6_Location Plan_A4_C.PDF (699 KB)
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>PHSV consider the new Local Plan provides the opportunity to reconsider Farleigh Fields, Backwell in the context of a Local Plan Review rather than through the development management process. The site offers the following benefits:</p> <ol style="list-style-type: none"> 1. It is sustainable, close to a range of facilities and within walking distance of Nailsea and Backwell Station; 2. It can meet housing needs in the short-term to bridge the gap between the requirement the strategic development location and its consequent infrastructure requirements coming forward; 3. However the settlement hierarchy is constructed, Backwell remains the most sustainable service village in North Somerset; 4. The site does not extend the general extent of the built up area of the village; 5. Development of the northern flatter part of the land adjacent to existing houses on Farleigh Road enables the retention of the majority of the site as open space to address landscape and heritage issues; 6. The site is available and deliverable <u>Farleigh Fields, Backwell</u> Of particular relevance is the context provided by emerging JSP Policy 7.4, which proposes 700 dwellings west of Backwell, because the planning application was refused on the basis that 220 dwellings were not at a level appropriate to the scale of the existing village and would be out of keeping with the overall character of the village and its landscape setting. Clearly that conclusion has now been overtaken by events and needs to be assessed in the light of the emerging JSP policy for Backwell, both in respect of scale and location. This view was also supported by the Inspector into the planning application appeal who said '<i>nor am I persuaded by the evidence . . . that the scale of development proposed would necessarily be disproportionate to the existing settlement or that, as a matter of principle, it would have a significant effect in terms of community cohesion.</i>' In addition, the reliance on conflicts with the Backwell Neighbourhood Plan ceases to be relevant in the context of the new Strategic Planning Policy and Local Plan Review which will both post-date the Neighbourhood Plan. i) ScaleThe appeal Inspector also provided some important conclusions on landscape and character and appearance (IR344): 	

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		<p>7. Whilst the planning application was eventually refused for 220 dwellings, that number evolved through discussions with the Local Planning Authority initial work on the application identified a development envelope capable of accommodating up to 500 dwellings without significant impacts on issues of acknowledged importance. The original application submitted for 340 dwellings on a reduced footprint on the basis of an assessment of the housing needs at that time. However, following discussions with the Local Planning Authority and in response to other consultation responses, the application was revised to include 220 dwellings to better reflect the character of the village. On the basis of the emerging JSP proposals, it is clearly appropriate to reassess the development potential and scale of development at Farleigh Fields and the contribution it can make to meeting the Local Plan non-strategic housing requirements. ii) Character and Appearance</p> <p>8. Notwithstanding consideration of land at Farleigh Fields, Backwell through both the development plan and development management processes the preparation of a new Local Plan provides the opportunity to view the potential of the land in respect of current and changed circumstances. It is important to consider the site, particularly in respect of the emerging West of England JSP and the appeal decision on the most recent planning application for 220 dwellings.</p> <ol style="list-style-type: none"> 1. <i>'NSC's concerns in this regard relate to a large extent to matters of character and appearance rather than landscape impact as such'.</i> 2. <i>'The site is reasonably self-contained in large part due to the screening effect of the existing development that surrounds it as well as to an extent by planting and topography'</i> 3. <i>'For this reason, combined with the proposed location of the proposed houses and associated works to the lower lying parts of the site, and subject to careful consideration of the matters that would be reserved for future consideration, the appeal scheme would have a very limited effect on the character and appearance of the area beyond the immediate area. Indeed any such effects would be largely limited to within the site itself.'</i> (our emphasis). <p>In addition the Inspector recognised the development would only have local impacts (IR346 <i>'in short the site is important locally . . .'</i>) and <i>'cannot be said to display the characteristics necessary for it to be a "valued landscape" in terms of the framework'</i> (IR347).</p> <p>iii) Location</p> <p>Backwell (together with Nailsea) is identified as an appropriate location for strategic development in the JSP. Specifically development is to take place to the west of Nailsea and Backwell because it would avoid Green Belt and flood issues. Backwell is also identified as a service village in the adopted Core Strategy and is one of the larger service villages with a range of services and facilities including, unusually, a secondary school and swimming pool and access to a mainline railway station.</p> <p>North Somerset carried out a comparative assessment of rural settlements as evidence for the now adopted Site Allocations Plan in the <i>'Assessing the sustainability and settlement hierarchy of rural settlements in North Somerset'</i> February 2016 and in the separate executive summary document October 2016. Each settlement was assessed against eight components and scored according to a RAG rating which showed that Backwell was assessed as being the most sustainable service village in North Somerset, by some margin. That evidence remains relevant now and therefore Backwell is an appropriate location for deliverable non-strategic development providing a buffer to enable the delivery of strategic infrastructure necessary for the development of the proposed SDL's at Nailsea and Backwell.</p>	

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		<p>Farleigh Fields is outside the Green Belt and the principal flooding areas and the officer's delegated report on the previous application concluded that '<i>subject to the appropriate conditions in Section 106 contribution, there is no transport or highway objection to the proposal.</i>' In addition the area proposed in the JSP is located in an open agricultural landscape outside the village settlement boundary. In comparison Farleigh Fields is entirely enclosed by existing development and within walking distance of the village centre and is owned outright by PHSV.</p> <p>Farleigh Fields can therefore deliver housing early in the plan period and should be allocated as non-strategic development in addition to the land at west Backwell.</p> <p>A site location plan showing the extent of Persimmon Homes land ownership at the Farleigh Fields site is attached.</p> <p>1. iv) Local Green Space</p> <p>Two fields have been designated as Local Green Space in the adopted Site Allocations Plan to recognise their importance in terms of the setting of St Andrew's Church and the views afforded to it from the Public Right of Way which crosses the field. As demonstrated in the 2015 planning application, these fields and indeed a greater area, can be retained as open green space as part of any allocation for development.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p><u>Farleigh Fields, Backwell</u></p> <p>Notwithstanding consideration of land at Farleigh Fields, Backwell through both the development plan and development management processes the preparation of a new Local Plan provides the opportunity to view the potential of the land in respect of current and changed circumstances. It is important to consider the site, particularly in respect of the emerging West of England JSP and the appeal decision on the most recent planning application for 220 dwellings.</p> <p>Of particular relevance is the context provided by emerging JSP Policy 7.4, which proposes 700 dwellings west of Backwell, because the planning application was refused on the basis that 220 dwellings were not at a level appropriate to the scale of the existing village and would be out of keeping with the overall character of the village and its landscape setting. Clearly that conclusion has now been overtaken by events and needs to be assessed in the light of the emerging JSP policy for Backwell, both in respect of scale and location. This view was also supported by the Inspector into the planning application appeal who said '<i>nor am I persuaded by the evidence . . . that the scale of development proposed would necessarily be disproportionate to the existing settlement or that, as a matter of principle, it would have a significant effect in terms of community cohesion.</i>' In addition, the reliance on conflicts with the Backwell Neighbourhood Plan ceases to be relevant in the context of the new Strategic Planning Policy and Local Plan Review which will both post-date the Neighbourhood Plan.</p> <p>i) Scale</p> <p>Whilst the planning application was eventually refused for 220 dwellings, that number evolved through discussions with the Local Planning Authority initial work on the application identified a development envelope capable of accommodating up to 500 dwellings without significant impacts on issues of acknowledged importance. The original application submitted for 340 dwellings on a reduced footprint on the basis of an assessment of the housing</p>	

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		<p>needs at that time. However, following discussions with the Local Planning Authority and in response to other consultation responses, the application was revised to include 220 dwellings to better reflect the character of the village. On the basis of the emerging JSP proposals, it is clearly appropriate to reassess the development potential and scale of development at Farleigh Fields and the contribution it can make to meeting the Local Plan non-strategic housing requirements.</p> <p>ii) Character and Appearance</p> <p>The appeal Inspector also provided some important conclusions on landscape and character and appearance (IR344):</p> <ol style="list-style-type: none"> 1. <i>'NSC's concerns in this regard relate to a large extent to matters of character and appearance rather than landscape impact as such'.</i> 2. <i>'The site is reasonably self-contained in large part due to the screening effect of the existing development that surrounds it as well as to an extent by planting and topography'</i> 3. <i>'For this reason, combined with the proposed location of the proposed houses and associated works to the lower lying parts of the site, and subject to careful consideration of the matters that would be reserved for future consideration, the appeal scheme would have a very limited effect on the character and appearance of the area beyond the immediate area. Indeed any such effects would be largely limited to within the site itself.' (our emphasis).</i> <p>In addition the Inspector recognised the development would only have local impacts (IR346 <i>'in short the site is important locally . . .'</i>) and <i>'cannot be said to display the characteristics necessary for it to be a "valued landscape" in terms of the framework'</i> (IR347).</p> <p>iii) Location</p> <p>Backwell (together with Nailsea) is identified as an appropriate location for strategic development in the JSP. Specifically development is to take place to the west of Nailsea and Backwell because it would avoid Green Belt and flood issues. Backwell is also identified as a service village in the adopted Core Strategy and is one of the larger service villages with a range of services and facilities including, unusually, a secondary school and swimming pool and access to a mainline railway station.</p> <p>North Somerset carried out a comparative assessment of rural settlements as evidence for the now adopted Site Allocations Plan in the <i>'Assessing the sustainability and settlement hierarchy of rural settlements in North Somerset'</i> February 2016 and in the separate executive summary document October 2016. Each settlement was assessed against eight components and scored according to a RAG rating which showed that Backwell was assessed as being the most sustainable service village in North Somerset, by some margin. That evidence remains relevant now and therefore Backwell is an appropriate location for deliverable non-strategic development providing a buffer to enable the delivery of strategic infrastructure necessary for the development of the proposed SDL's at Nailsea and Backwell.</p> <p>Farleigh Fields is outside the Green Belt and the principal flooding areas and the officer's delegated report on the previous application concluded that <i>'subject to the appropriate conditions in Section 106 contribution, there is no transport or highway objection to the proposal.'</i> In addition the area proposed in the JSP is located in an open</p>	

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		<p>agricultural landscape outside the village settlement boundary. In comparison Farleigh Fields is entirely enclosed by existing development and within walking distance of the village centre and is owned outright by PHSV.</p> <p>Farleigh Fields can therefore deliver housing early in the plan period and should be allocated as non-strategic development in addition to the land at west Backwell.</p> <p>A site location plan showing the extent of Persimmon Homes land ownership at the Farleigh Fields site is attached.</p> <p>iv) Local Green Space</p> <p>Two fields have been designated as Local Green Space in the adopted Site Allocations Plan to recognise their importance in terms of the setting of St Andrew's Church and the views afforded to it from the Public Right of Way which crosses the field. As demonstrated in the 2015 planning application, these fields and indeed a greater area, can be retained as open green space as part of any allocation for development.</p>	
R Smith	Walsingham Planning	<p>Comments prepared on behalf of Land Value Alliances.</p> <p>LVA are the prospective developers of land North of Nailsea as edged red on the attached plan at Appendix 1 and consider that the site represents a sustainable location for development at Nailsea which should be seriously considered both as part of the emerging Joint Spatial Plan (JSP) and as part of NS Council's vision for Nailsea in the emerging Local Plan 2036.</p> <p>The site comprises approximately 25 hectares of undeveloped land which lies adjacent to the Northern boundary of Nailsea. The site represents the optimal location for an extension to the town. Development of the site could deliver approximately 600 new homes and around 2 hectares of employment land with strategic green buffers and significant areas of community open space.</p> <p>Nailsea Town Council has consistently supported development in this location and remains supportive of such an approach due to the unique benefits that the development could deliver. One key benefit is the delivery of a link road as part of the development that would significantly reduce traffic flows at a number of local junctions.</p> <p>Whilst the site is located within the Green Belt the preparation of the Local Plan 2036 provides an opportunity to consider allocating sites and reviewing Green Belt boundaries in consultation with parishes/town councils.</p>	Appendix 1 Site Location Plan.pdf (1.9 MB)
Roger Daniels	Burrington Parish Council	<p>Submission of a site for Englishcombe Road, Bristol. Site location plan attached.</p>	Representations on behalf of Mr John Patch.pdf (514 KB)
S Harris		<p>As part of this representation, the land as outlined on the enclosed plan ref. Figure 1, is offered as a residential allocation; either in its own right or as part of a larger residential allocation.</p> <p>The land is located West of Brinsea Road, Congresbury (343974, 162823), with the nearest post code being BS49 5JJ. The site is a gently sloping, southerly aspect parcel of land which adjoins the settlement boundary of Congresbury. It is one of the few areas of land that adjoin Congresbury which benefit from being outside of an area</p>	Fig 1 - Location Plan - Brinsea Road Congresbury P0232-43 Rev A.pdf (633 KB) Land at Brinsea Road - LP Issues and Options Rep.pdf (550 KB)

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		<p>considered to be at risk of flooding (Flood Risk Zone 1). A small area in the south western corner of the site is within the area considered to be at risk of flooding (albeit benefitting from flood defence infrastructure), however a carefully designed layout could easily accommodate this area as being 'not for development' and instead a landscaped area, possibly public open space.</p> <p>A screen shot of the Environment Agency's flood risk map is shown as reference. This can be considered alongside the enclosed Site Location Plan ref. Figure 1. For the avoidance of doubt, the yellow marker only pin points the closest post code and is not the site. Please refer to Figure 1 (enclosed) for an outline of the site being put forward for consideration.</p> <p>The land is accessed via Brinsea Road to the east. The land is outside of the Area of Outstanding Natural Beauty (AONB), does not form part of the Green Belt and is also not constrained by the Green Wedge.</p> <p>The Draft Local Plan 2036: Issues and Options Consultation Document takes forwards the objectives of The West of England Joint Spatial Plan (WoE JSP).</p> <p>The WoE JSP sets out a prospectus for sustainable growth that will help the area meet its housing and transport needs for the next twenty years. It will guide the planning strategies for planning authorities Bristol City, North Somerset, Bath and North East Somerset and South Gloucestershire Councils.</p> <p>The JSP has been submitted to the Planning Inspectorate and it is anticipated it will be examined in Autumn/Winter 2018. It is expected to be adopted in 2019. Given its relatively advanced stage towards adoption, it is the guiding strategy for the next North Somerset Local Plan 2036.</p> <p>The 'Issues and Options Document' informs North Somerset's consultation. It proposes a new garden village centrally between Langford and Congresbury which is being referred to as 'Mendip Spring Garden'. The consequence of developing a new 'garden village' close by with thousands of new homes being built is that there will also be an important drive to secure improvements to existing highway infrastructure as well as to build new transport and green infrastructure links.</p> <p>The highway of Stock Lane becomes Brinsea Road as it approaches Congresbury. The application site bordering this road on its western side provides an opportunity to contribute towards highway improvements and landscaping along Brinsea Road were the site the subject of this representation brought forward for residential development.</p> <p>The new development of the garden village will provide new shops and schools within walking distance of the site whilst improvements to existing infrastructure will no doubt mean Congresbury village itself will also become more accessible.</p> <p>The site outlined in Figure 1 is one of only a few options for development which are outside of an area at risk of flooding and have the potential to secure good access links to new infrastructure. The site also has the potential to provide a green corridor link walkway / cycleway between the new garden village and Congresbury.</p> <p>The site would provide a valuable addition for residential development and securing infrastructure improvements and providing linked sustainable access routes, if it were allocated for housing.</p>	

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		Mrs Harris would like to respectfully invite the Authority to consider the site as outlined within the red line on the enclosed plan ref. Figure 1 to be incorporated as / within a residential allocation in the next North Somerset Local Plan 2036.	
Sheila Tyler		I enclose details of our previous submissions to the recently adopted Local Plan, and appreciating these sites were not considered required during the latter stages of that Plan, we would seek a full Green Belt assessment with these sites given consideration along with any other submitted, but also with a detailed assessment of the settlement boundary edges adjacent to the Green Belt. Failure to assess such opportunities increases the need for housing sites and larger strategic areas to be proposed that do not provide housing in the short or short-medium term as they require Masterplanning and site assembly. Both sites proposed in this submission are in a single ownership and readily available for development subject to allocation to change the designation, following obviously a thorough assessment of the site within a wider Green Belt review at this time that we consider appropriate.	Representations to West of England Joint Spatial Plan.pdf (114 KB) Land East of Clevedon.pdf (2.2 MB) Representations to North Somerset Site Allocations Plan.pdf (110 KB) Land North of North Weston.pdf (2.2 MB)
South West Strategic Developments (SWSD)		<p>POTENTIAL RESIDENTIAL SITE – EXTENSION TO PREVIOUSLY APPROVED SITE KNOWN AS ‘LAND NORTH OF OLD MIXON ROAD’ (REF: 16/P/0150/O) RESPONSE TO LOCAL PLAN ‘ISSUES AND OPTIONS’ DOCUMENT</p> <p>We write in respect to the above site which was granted outline planning permission via appeal in April 2017 and in connection with the council’s current Local Plan ‘Issues and Options’ consultation. This response is made on behalf of South West Strategic Developments (SWSD) and focuses on the potential to provide additional development on the land that was subject to application 16/P/0150/O and the connected appeal.</p> <p>We will not comment on the main parts of the Issues and Options Document nor follow the questions asked as our observations in respect to this site are fairly concise.</p> <p>Additional Residential Land</p> <p>The appeal proposals (master plan contained at appendix 2) included an option to provide pitches in the northern part of the site. The legal agreement associated with the development allowed for either these pitches be delivered, or a commuted sum be paid to off-site provision. All of the developers who have considered this site have identified that their preference would be the off-site contributions route and this seems to make sense given that there are existing football clubs already established in the area that need improvement works.</p> <p>This means that part of the site could be used to provide additional housing in accordance with policy CS28. As part of discussions with NSC officers connected to application 16/P/0150/O the council asked us to consider using this land for residential use; however, it remained as pitches for the appeal because the requirement for this social infrastructure was still undetermined and on-site provision was considered as potentially required. This is no longer the case and so the land’s use for accommodating additional housing is under consideration.</p> <p>This land lies partly within defended flood zone 2 and officers were aware of this when previously recommending that it be used for residential use. This is not unsurprising given that a large amount of land in Weston lies within</p>	South West Strategic Developments Appendix 1 - 161206 13191 1000D Redline Plan.pdf (3.7 MB) South West Strategic Development Reps Letter Old Mixon.pdf (328 KB) South West Strategic Developments Appendix 2 - 13191 3001E Illustrative Framework Plan.pdf (6.3 MB)

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		<p>these areas and a large proportion of existing allocations are within defended flood zone 2. Our flooding engineers Vectos have been examining this issue and have produced a mitigation strategy that involves land raising and compensatory flood plan storage. Discussions in respect to this are ongoing with the Environment Agency.</p> <p>We anticipate that these mitigation measures will allow an additional 30-40 dwellings to be provided on this land. We therefore request that as part of the new Local Plan the council consider allocating the whole site as identified in appendix 1 for up to 200 dwellings. This will boost housing supply in a highly sustainable location where the scale of the development will allow swift delivery. It should also be noted that the access proposals for application 16/P/0150/O, and the connected transport assessment, modelled the impact on junctions related to 250 dwellings. Therefore, the quantum of development we propose has already been tested in highways terms and has been found to be acceptable. We would be happy to re-provide any of this information if required.</p>	
Stokes Morgan Planning Ltd	Stokes Morgan Planning Ltd	<p>We support the aim to identify more opportunities for residential development. Whilst the principle of additional employment land on the edge of Portishead (through the small-scale release of Green Belt land) is welcomed, the reality is that much of the Green Belt surrounding Portishead is in the Flood Zone, or is SSSI or SNCI land (blue, red and orange on the map below, respectively).</p> <p>In this context, it is clear that there are limited areas where green belt land could be released. It is also the case that the town has been substantially developed over the last fifteen-twenty years, and that brownfield land within the town is limited. If additional housing is to be built in Portishead, it will require the releasing of green belt land, and there is the potential for these two aims to be incompatible with each other.</p> <p>In this context, SHLAA site HE18133 (show as red star on map above; see following site plan and details) is one such site that sits on the fringe of the existing built development and has the potential to deliver additional growth within the Plan period without the precursor of significant additional infrastructure requirements. If Green Belt land is to be released around the edge of Portishead, locations such as this would be better suited to meeting the housing need.</p> <p>This site in particular would be ill-suited for employment land, given the surrounding nature constraints, whereas a housing scheme would be better able to provide the appropriate site mitigation. In terms of access, the local roads would be less well-suited to commuter traffic, whereas in terms of housing, the land is more demonstrably sustainable given its proximity to schools, and the services and facilities in Portishead town centre. Employment uses would be better-suited to central Portishead where they can be more easily reached by a greater number of people (particularly when the Portishead rail link opens), or alternatively, to the east of the town, within the flood zone, where they would be classed as less vulnerable forms of development, as opposed to housing, which is a more vulnerable form of development.</p>	ES 207_NSC_LP_Response_North_Weston_Wood_FINAL.pdf (758 KB)
Strongvox Homes	Strongvox Homes	<p>The revised North Somerset Local Plan will need to plan for the growth targets set out in the JSP (total of 25,000 new homes up to 2036). Of these, 11,000 new homes need to be allocated. Whilst there will be growth directed to a combination of two new villages and extensions to Nailsea and Backell, the new local plan should also pro-</p>	

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		<p>actively plan for growth in the larger settlements and, particularly, the Service Villages including Banwell. Banwell supports a range of local facilities and services and opportunities exist on the existing village boundary that can provide direct and convenient links to services within the village. The new Local Plan should provide for housing allocations on sites within or adjoining the Service Villages and promote opportunities for housing. The Local Plan should not solely rely on a limited number of new villages (two) and urban extensions to provide the majority of the planned growth.</p> <p>Policy CS32 currently allows for the development of suitable and sustainable sites that adjoin the settlement boundaries of Service Villages provided that such site are for 25 dwellings or less. This does not allow for larger sites (capable of delivery of greater than 25 dwellings) to come forward where such sites are particularly well located in relation to village centres and have low impacts in terms of design, layout, landscape and other planning considerations. Such a cap can also prevent sites that would otherwise be viability from coming forward - in instances where, due to the presence of abnormal site costs, a developer may not be able to deliver sites with an arbitrary cap of 25 dwellings. Strongvox Homes supports Option 1 but cautions against the new local plan retaining the upper limit of 25 dwellings that is currently stated in Core Strategy Policy C32.</p> <p>On 12th November 2018, Strongvox Homes submitted an application for Outline Planning Permission for 63 homes on land west of Wolvershill Road, north of Wolvershill Park and Knightscott Park, Banwell (Application ref 18/P/4735/OUT). The proposal is well located to the village of Banwell and will not result in any significant adverse impacts on local services and infrastructure. The site provides an excellent example of a development that can provide for the needs of local residents in terms of a mix of sizes of units, 30% affordable homes and is of a layout and form that can integrate well within the village. It provides an example of the type of site that should be considered for inclusion within the settlement limits of a Service Villages - in this case, Banwell.</p>	
Taylor Wimpey - The Vale		<p>These representations have been prepared and submitted by Savills with input from Peter Brett Associates (PBA) and Barton Willmore on behalf of Taylor Wimpey (TW) in response to North Somerset Council's (NSC) Issues and Options Document (the 'consultation document') and associated evidence base.</p> <p>Context to these Representations TW have a number of significant land interests within the administrative area of NSC, however, these representations relate solely to the land controlled by TW to the south west edge of Bristol, known as The Vale.</p> <p>The Vale comprises circa 300 hectares of land capable of accommodating a major mixed-use new community including approximately 4,500 dwellings, employment opportunities, new schools, shops, leisure and community facilities, as well as a significant volume of public open space, in a highly sustainable form and in a highly sustainable location.</p> <p>Despite promotion through the emerging West of England (WoE) Joint Spatial Plan (JSP), The Vale is not identified as a Strategic Development Location (SDL) within the draft submitted for Examination in April 2018 and remains, for now, within the Green Belt. However, TW will continue to promote the land at the Examination and through the development of the Local Plan given the credentials of the site, as explained above. A copy of the representations, submitted in response to the draft JSP, promoting The Vale as an alternative are attached at Appendix 11.</p>	<p>The Vale - Local Plan Issues and Options Reps FINAL w appds.pdf (4.9 MB)</p>

Respondent Name	Respondent Organisation	Comment	Attached documents
		<p>These representations should be read in the context of TW's submissions relating to The Vale throughout the JSP's evolution (specifically the submissions to the draft JSP, submitted in January 2018 – elements of which are appended to these representations), as well as submissions to NSC's Pre-Commencement consultation in July 2016 and the Generating Ideas consultation in January 2018.</p> <p>As explained in previous representations we understand NSC's rationale for beginning the preparatory work for the review of the Local Plan in tandem with the development of the strategic JSP, with the caveat that any work on the Local Plan should be considered potentially abortive until such a time when Inspectors have concluded on the soundness of the JSP.</p> <p>We raise this again as, since the last Local Plan consultation, the JSP has been submitted for Examination, accompanied by significant levels of outstanding unresolved objections from TW2 and a wide range of others to its core components – including the housing target, Spatial Strategy, particular SDLs (Banwell and Churchill) and infrastructure costs / deliverability. This heightens the risk associated to undertaking abortive work associated to the Local Plan.</p> <p>Whilst it is the role of the JSP, and not the Local Plan, to identify the SDLs within North Somerset, the reasons and evidence behind our objections to the proposed Banwell and Churchill SDLs means that it is impossible to reconcile our in principle objections via the detail for these locations within the Local Plan – ie the locations are fundamentally and fatally flawed, regardless of detail.</p> <p>For the avoidance of doubt, our key arguments against the proposed Banwell and Churchill SDLs are summarised again, as well as the rationale for The Vale as a sustainable and deliverable alternative SDL.</p> <p>Structure of the Representations</p> <p>The comments within these representations are structured as follows:</p> <p>? Section 1 – Issues and Options consultation document ? Section 2 – North Somerset Strategic Housing Land Availability Assessment ? Section 3 – Employment Land Review, prepared by Atkins ? Section 4 – Landscape Sensitivity Assessment and Addendum, prepared by Wardell Armstrong ? Conclusions and Summary</p> <p>Within Section 1, these representations follow the structure of the consultation document, however, do not necessarily respond to the specific questions posed.</p>	
Taylor Wimpey - Turley Associates	Turley Associates Ltd	<p>Overview</p> <p>These representations are made on behalf of Taylor Wimpey who have interests in a site at Stowey Road, Yatton. The purpose of these representations is to highlight to the Council that the site at Stowey Lane is suitable for residential development, capable of achieving development within five years and therefore</p>	<p>MA3001 Reps to Issues and Options.pdf (222 KB)</p>

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		<p>assisting the Council with their housing land supply and in a sustainable location at a Service Village where development of an appropriate scale can be allocated through the emerging Local Plan.</p> <p>The site is located adjoining the settlement boundary of Yatton which, as a Service Village, is capable of accommodating development of a size and character appropriate to the settlement.</p> <p>The site is outside of the defined settlements boundary for Yatton but also outside of the Green Belt and not subject to environmental designations or within a strategic gap. The site is, therefore, suitable and available for development and is an appropriate site for identification for development in the emerging Local Plan. Additional detail on the suitability of the site is set out below.</p> <p>Land at Stowey Lane, Yatton</p> <p>The identification of sufficient sites that are suitable, available and deliverable is vital to ensuring that the housing needs of the District are met. The site at Stowey Lane has the potential to deliver up to 60 dwellings which is an appropriate scale to be accommodated at a Service Village such as Yatton. The development would make efficient use of an available site and deliver high quality new homes, including affordable homes. The allocation of this site within the new Local Plan for residential development would demonstrate that the Council are proactively seeking to address the shortfall in housing supply.</p>	
Taylor Wimpey UK Ltd (DLP)	DLP Planning	TW support the early preparation of the NLP and broadly agree with the main issues presented in NLPIO and the identification of the Backwell SDL and Rodney Road as part of this wider allocation.	Rodney Road, Backwell_Taylor Wimpey UK Ltd_NSC LP Issues and Options Consultation Reps_Final_101218.pdf (760 KB)
Taylor Wimpey UK Ltd (DLP)	DLP Planning	This document sets out TW's response to the emerging NLP and the associated evidence base related to the Backwell SDL only and supports the promotion of land that TW has interests in at the Backwell SDL (including land at Grove Farm, land at Burnt House Farm and Rodney Road).	Burnt House Fm, Fackwell SDL_Taylor Wimpey.pdf (1.0 MB)
Trustees of SSE	Salmon Settled Estate	Submission of a site at Tower Farm, South of Tower Road Portishead of 28.21 ha. Proposals for approx. 450-550 houses, plus associated community uses. Land is in the Green Belt but the increase in the requirement for new houses means we consider that small scale release of land from the Green Belt for housing in sustainable locations is justified.	Tower Farm, Portishead site submission.pdf (397 KB)
Waddleton Park Limited (Savills)	Waddleton Park Limited	<p>We support the decision of North Somerset Council to continue to bring forward the new Local Plan (nLP) prior to the examination of the Joint Spatial Plan (JSP). This will ensure a timely examination of the Part II Plan following the adoption of the JSP.</p> <p>The importance of the timely adoption of the nLP is emphasised by the fact that it will be the nLP which will allocate the sites to meet the updated housing requirement set out in the JSP. The adoption of the nLP is therefore</p>	Call for Sites Form.docx (79 KB) Site Location Plan.pdf (767 KB) Waddleton Park Ltd_.pdf (2.7 MB)

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		<p>critical in ensuring that housing needs are met over the plan period, in addition to maintaining a short-medium term housing land supply; notably through five year housing land supply (5YHLS).</p> <p>This is underpinned by the current shortfall in 5YHLS within North Somerset against the adopted Core Strategy target, and emphasises the need to ensure the sites identified in the nLP provide an immediate opportunity to deliver housing to meet the short-medium term need.</p> <p>The National Planning Policy Framework (NPPF, 2018), and associated Planning Practice Guidance (PPG), confirm that all settlements have a role in supporting sustainable development and meeting housing needs. In rural areas, the PPG states that "all settlements can play a role in delivering sustainable development" and that a thriving rural community is dependent on retaining local services and community facilities, and that development in more rural areas will require different sustainable transport solutions (50-001-20160519).</p> <p>We welcome the recognition of this in the Consultation Document and associated evidence base, and the decision to reconsider the existing spatial hierarchy in light of the updated needs assessment, and national planning policy.</p> <p>The recognition of the differing roles of settlements in meeting the need for sustainable development must be reflected in the emerging Sustainability Appraisal (SA), to ensure that all reasonable options are considered through the iterations of the SA, and that opportunities to maximise sustainable development to meet the existing and future housing needs of North Somerset, and the wider West of England, are identified.</p> <p>Sandford has been identified as a suitable location for growth through the development management process following the approval of 118-dwellings in 2016, and the recommendation of approval for another 85-dwelling scheme by Officers in 2018. The nLP provides an opportunity to update the local plan in line with the up to date development context.</p> <p>Land South of Greenhill Road could deliver housing within a sustainable location, and within a small-medium sized site, in accordance with recent Government policy.</p> <p>Land South of Greenhill Road</p> <p>The site comprises 1.88 hectares of agricultural land to the east of Sandford; south of the A368 (Greenhill Road). It comprises a single field in agricultural use, and is bordered by existing dwellings and built form on all four sides. A site location plan is enclosed at Appendix 1.</p> <p>The site lies within Flood Zone 1. It is relatively level; falling from 32.4m in the south-east to 28.4m in the north-west. The tree group within the southern end of the western hedgerow is subject to a Tree Protection Order (TPO 1091).</p> <p>The site borders the Mendip Hills Area of Outstanding Natural Beauty (AONB) which runs along the site's southern edge. The southern edge also includes a Public Right of Way.</p> <p>250m to the west of the site is the Grade II Listed Pool Farmhouse. There are no other designated heritage assets in the vicinity of the site.</p>	

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		<p>The site is suitable for residential development, with a number of opportunities to deliver housing on the site. This includes a scheme for approximately 35 dwellings including affordable housing provision, or alternatively a care home alongside approximately 10 dwellings including affordable homes. The nature of development proposals for the site would be subject to discussions with North Somerset Council.</p> <p>Further details are in the attached submission and appendices</p>	
Wainhomes		<p>2.9. It is noted (page 19) that potential sites will be identified at the next stage of the Local Plan. Wainhomes Severn Valley has interests in the following site which should be considered as part of the preparation of the next stage of the local plan process.</p> <p>Land North of Greenhill Road, Sandford</p> <p>2.10. The Land North of Greenhill Road, Sandford (see location plan at Appendix 1) is a sustainable location for at Sandford. The land is identified as site HE18344 in the Strategic Housing Land Assessment 2018 (SHLAA) and could accommodate approximately 80 dwellings. Sites such as this should be considered favourably due to the important contribution they can make to the housing land supply.</p>	<p>Land north of Greenhill Road Sandford Final Representations 10.12.18.pdf (197 KB) Wainhomes - Land north of greenhill road, sandford Location Plan (160302 L 01 01).pdf (168 KB)</p>

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