North Somerset Local Plan 2041

Regulation 22
Consultation Statement

May 2026



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1. Introduction

1.1 This document sets out how North Somerset Council has sought participation from communities and stakeholders during preparation of its Local Plan in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 It meets Regulation 22(1)(c) and demonstrates that consultation on the preparation of the North Somerset Local Plan has been undertaken in accordance with the relevant regulations and the council's Statement of Community Involvement (2019). Regulation 22(1)(c) requires the submission to the Secretary of State of a statement setting out:

1. which bodies and persons the local planning authority invited to make representations under Regulation 18;
2. how those bodies and persons were invited to make representations under Regulation 18;
3. a summary of the main issues raised by the representations made pursuant to Regulation 18;
4. how any representations made pursuant to Regulation 18 have been taken into account;
5. if representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
6. if no representations were made in Regulation 20, that no such representations were made.

1.3 Information to address points 1- 4 above is set out in Section 2 of this statement. Information to address point 5 is provided in Sections 3 and 4 of this statement. Point 6 is not applicable as representations were made pursuant to Regulation 20.



2. Consultation on the North Somerset Local Plan 2041

2.1 The new Local Plan for North Somerset was launched in March 2020 with the publication of the Local Development Scheme (LDS), which set out the timetable for the Local Plan, and the Pre-commencement Document which outlined the proposed scope of the content. These two publications marked the formal start of the process. Consultation on the pre-commencement document ran from **10 March until 22 April 2020**.

2.2 Following the launch of the new Local Plan two initial consultations were undertaken focusing firstly on the challenges the Local Plan would have to address and secondly the various choices on how spatially the plan could address these challenges. The two consultations were called Challenges for the Future and Choices for the Future.

Challenges for the Future Consultation (Reg 18)

2.3 The Challenges for the Future consultation focused on the key high level issues facing North Somerset over the plan period such as the climate emergency, provision of housing, supporting the economy, creating sustainable development, the future role of the Green Belt and protecting the natural environment. The document also included a proposed vision and strategic priorities for the plan period. This consultation took place from **22 July to 2 September 2020**. It sought the views of local communities, businesses, and the development industry on issues the Local Plan would need to address, and the responses received helped to inform the second stage of consultation which focused on the choices around the strategic approach to new development. How we consulted and a summary of the main issues raised are set out in the **Challenges for the Future Consultation Statement (October 2020)**.

Choices for the Future Consultation (Reg 18)

2.4 The Choices for the Future document set out four broad spatial development alternatives for discussion. This consultation took place from **2 November – 14 December 2020**. The four spatial options that were consulted on were ‘Retain the Green Belt’, ‘Urban Focus’, ‘Transport Corridors’ and ‘Greater Dispersal’. Overall, taking ‘strongly support’ and ‘support’ together, Urban Focus was most favoured by respondents, although Retain Green Belt was very close behind and scored better in terms of ‘strongly



support'. The response to the Transport Corridors option was roughly 50/50 in terms of overall support/objection. The Greater Dispersal approach was significantly less well supported. How we consulted on the Choices for the Future document and a summary of the main issues raised are set out in the **Choices for the Future Consultation Statement (February 2021).**

2.5 The response to the Challenges and Choices consultations and an assessment of emerging evidence enabled the formulation of a 'spatial strategy' which would provide the framework for the next stage of plan preparation. The spatial strategy was agreed by the Council's Executive Committee on 28 April 2021 for further testing and assessment, and to act as the framework for the preparation of the Preferred Options document.

Preferred Options Consultation (Reg 18)

2.6 The Local Plan Preferred Options consultation document, along with many supporting documents which provided the evidence and justification for the policies and allocations within the emerging plan, was the first full draft of a new Local Plan. Public consultation took place from **14 March until 29 April 2022**. It contained:

- Strategic Policies: These policies set out the overall strategy for the pattern, scale and design of places, make sufficient provision for housing, employment and other uses, infrastructure, community facilities, conservation and the enhancement of the built and historic environment and address climate change and mitigation. These are high level policies which provide the framework for more detailed policies in the plan and for neighbourhood plans.

- Locational Policies: These comprise site allocations and other designations which are identified on the Policies Map.

- Development Policies: These are the detailed development management policies which cover a wide range of issues including design, residential infilling, climate change, net zero construction, renewable energy, drainage, transport, economic development, town centres, green infrastructure, affordable housing, rural development and infrastructure delivery.

2.7 The purpose of the Preferred Options consultation was to gather feedback on the first full draft of the new Local Plan and the proposed spatial strategy including the proposed allocations and the new and reviewed policies from a wide range of stakeholders (such as residents, businesses, community groups, town and parish councils, and house builders) and identify issues and



potential amendments. The consultation process, level of responses received, and summary of the main issues raised are set out in the Preferred Options Consultation Statement (August 2022):

- Preferred Option Consultation Statement – Main Report (August 2022)
- Preferred Options Consultation Statement Appendix 1: Summary of Strategic Policies
- Preferred Options Consultation statement appendix 2 summary of Locational Policies
- Preferred Options Consultation statement appendix 3 summary of Development Policies
- Preferred Options Consultation statement appendix 4 summary of Schedules

How representations made pursuant to Regulation 18 were taken into account

2.8 Following the analysis of responses received to the Regulation 18 Preferred Option Consultation a report was presented to the council's Executive Committee setting out the main issues raised through the consultation and acknowledging that the Levelling Up and Regeneration Bill, and related national policy changes such as amendments to the NPPF, that were being discussed at that time could have a significant bearing on the direction of the plan, particularly in terms of releasing land from the Green Belt and the mechanism for determining the housing requirement.

2.9 Following consideration of the responses to the Preferred Options consultation, the Council's Executive Committee, on 7 September, requested that the Regulation 19 Local Plan should be developed recognising the constrained nature of North Somerset, offering greater protection to Green Belt and other sensitive sites.

2.10 Later that year, in December 2022, consultation on the national planning reforms took place. This included anticipated changes to the National Planning Policy Framework (NPPF) in relation to two topics of particular significance to North Somerset; the derivation of the housing requirement and the approach to using Green Belt and other significant constraints.

Pre-submission Plan 2039 (Reg 19)

2.11 The above factors set the context for the preparation of the Pre-submission (Reg 19) version of the plan which was consulted on between **27 November 2023 and 22 January 2024**. The plan period for the pre-submission plan was adjusted to 2024-2039 to



cover the required 15-year period and more significantly the housing requirement in the plan was based on a locally derived need, rather than the standard method requirement, and did not release any significant sites from the Green Belt. This was in anticipation of the expected changes that were set out in the NPPF consultation at the time.

2.12 On 19 December 2023, mid-way through the consultation on the Pre-submission Plan, the government published the revised National Planning Policy Framework (NPPF 2023). As explained above, the Regulation 19 version of the North Somerset Local Plan had been prepared in anticipation of government reforms and expected changes to the National Planning Policy Framework (NPPF) in relation to the derivation of the housing requirement and the approach to using Green Belt and considering other significant constraints. The anticipated changes were as expected in the NPPF and as such the plan would have been in accordance with national policy and ready to submit for examination.

2.13 However, paragraph 230 of the revised NPPF published in December 2023 set out the transitional arrangements for local plans being prepared at that time and stated: *"The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements".*

2.14 The North Somerset Local Plan had reached Regulation 19 stage before 19 March 2024 and as such would have been tested under the previous NPPF through the examination. This meant our approach to the housing requirement and Green Belt releases would not have been in accordance with the NPPF that the plan would be examined against. Having considered the responses to consultation and the guidance on transitional arrangements, the Council decided to publish a new version of the Regulation 19 plan for consultation after the 19 March 2024 date. How we consulted on the Pre-submission Plan 2039 and a summary of the main issues raised are set out in the North Somerset Local Plan 2039 Pre-submission Plan Consultation Statement (May 2024).



Pre-submission Plan 2040 (Reg 19)

2.15 This new Reg 19 Local Plan was prepared in the context of the December 2023 NPPF and contained various changes to the previous document. It updated the plan period to 2025-2040 as well as other changes in response to feedback from the previous consultation and other issues including:

- The housing supply position was updated to 15,275 dwellings against a requirement of 14,902 dwellings in line with the amended plan period.
- Housing sites were reviewed, new permissions added and capacities adjusted on sites such as at Wyndham Way, Portishead and North West Nailsea. A proposed housing allocation at Downside, Portishead was removed from the plan.
- The extent of the Parklands development and allocations were reviewed resulting in additional housing capacity. A new employment site was identified around West Wick roundabout and adjustments to the extent of the Strategic Gap, extent of the helicopter safeguarding zone and settlement boundary were made.
- The employment supply position was updated to 60 hectares against a requirement of 50 hectares.
- The previously proposed employment allocation at M5 J20 Clevedon was deleted.
- The requirement for a new secondary school at the Wolvershill strategic location was removed.
- A site for a new secondary school and cemetery were identified in Yatton.
- The proposed extension of the Green Belt inset at Bristol Airport was linked to compensatory improvements to the existing Green Belt.
- New Local Green Space sites were identified.
- Wheelchair accessible housing was stated to be required on large sites in respect of both affordable and market housing.
- Policies were reviewed to include references to support for the delivery of public art.
- A new policy was included relating to public open space adoption.
- Adjustments were made to the approach to assessing flood risk and the Coastal Change Management Area boundaries.
- References were added to the plan to provide policy support for green hydrogen production.



2.16 This updated Regulation 19 plan was approved by Cabinet on 17 July 2024 for consultation. However, almost immediately afterwards, on 30 July the new government published another draft NPPF which set out a mandatory standard method housing requirement. This standard method resulted in a considerably higher housing requirement for North Somerset of 23,700 dwellings over a 15-year period compared to the 15,275 identified in the drafted Regulation 19 plan. Work was temporarily paused on the plan and the updated Regulation 19 plan that had been endorsed by the committee was not consulted upon. This message was communicated to all interested parties who had commented on the last version of the plan via email, and more widely through a press release on the council website. A second press release was issued in September, advising of the next steps the council would be taking to ensure the local plan addressed the new national policy requirements.

2.17 Following the NPPF consultation an updated version was published in December 2024 and the transitional arrangements set out in paragraph 237 stated that: *'Those local Plans that reach Regulation 19 (pre-submission stage) on or before 12 March 2025 and whose draft housing requirement meets less than 80% of local housing need should proceed to examination within a maximum of 18 months from 12 December 2024, or 24 months of that date if the plan has to return to the Regulation 18 stage'.*

2.18 North Somerset's Local Plan had reached Regulation 19 stage before 12 March 2025 and the draft local housing requirement was less than 80% of the standard method requirement. As such the council's Executive Committee on 4 December 2024 agreed to undertake an further interim stage of consultation to identify additional housing sites to meet the standard method requirement to incorporate into a further revision to the Reg 19 version of the local plan, to be consulted upon in relation to the soundness of the document before submission for examination by June 2026 to comply with the transitional arrangements in NPPF paragraph 237.

Additional Sites Consultation (informal stage interim consultation)

2.19 North Somerset Council then undertook an Additional Sites consultation between **7 February and 21 March 2025**. The consultation aimed to identify where additional development was possible at sustainable locations across North Somerset, outside areas at risk of flooding or other significant constraints, in accordance with the spatial strategy in the draft plan. It took account of delivery and infrastructure issues, such as transport improvements and the provision of other services and facilities. The consultation was only in relation to potential new housing sites and not other aspects of the plan, including other policies and allocations.



2.20 The process of identifying further sites drew upon information from the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA forms part of the evidence base to assist plan making and is a technical assessment that considers the potential of sites for residential development. Sites that would yield greater than 10 dwellings were identified through the SHLAA and broadly categorised in relation to the spatial strategy. Sites were categorised as being either:

- Most suitable – located at the sustainable growth locations and identified as having most potential for further consideration.
- Other potential – sites at the towns and larger, more sustainable villages consistent with the spatial strategy.
- Less sustainable – sites at smaller villages and rural areas.

2.21 A Consultation Paper set out the process for identifying sites and this was published alongside a composite map of all the SHLAA sites and their categorisations. A sequential approach was identified in the Consultation Paper with priority locations for growth being strategic locations in or close to urban areas where there is an existing or proposed wide range of services, facilities and jobs and there are opportunities to encourage active and sustainable travel. This was followed by sites well related to towns and urban areas, then sites well related to villages, followed by relatively less sustainable sites elsewhere if the housing target could still not be met. Where exceptional circumstances exist and it is necessary to release land from the Green Belt, national policy directs us towards locations that are most sustainable in transport terms, offering a genuine choice of sustainable travel modes.

2.22 Following the close on the consultation on 21 March 2025 a Consultation Statement was published setting out the main issues raised and the level of response: Additional Sites Consultation - Consultation Statement (May 2025).

Pre-submission Plan 2041 (Reg 19)

2.23 On 18 June 2025 a report was taken to Cabinet to feed back on the Additional Sites consultation and to propose a package of residential and employment sites to be included in an updated Regulation 19 Plan, subject to ongoing evidence base work at that time. This enabled officers to proceed with producing a full updated pre-submission (Regulation 19) Local Plan. A report was then presented to Cabinet on 15 October 2025 to approve the full pre-submission plan for consultation.

2.24 The North Somerset Local Plan 2041 Pre-submission Plan was consulted on between **30 October and 12 December 2026**. The details of the consultation and level of response are set out in the next section.



Regulation 20 consultation responses

2.25 As explained in detail above, North Somerset Council has undertaken two Regulation 19 consultations - firstly in November 2023 (Local Plan 2039) and then the latest one in October 2025 (Local Plan 2041). Regulation 22(1)(c) requires the submission to the Secretary of State representations that were made pursuant to Regulation 20, the number of representations made, and a summary of the main issues raised in those representations.

2.26 Due to significant changes to the plan as a result of the increased housing number, including the release of strategic sites in the Green Belt, the Regulation 20 consultation responses and main issues raised are very different between the two consultations.

2.27 Following the Local Plan 2039 Regulation 19 Consultation the council published a Consultation Statement (May 2024) which sets out the number of representations made and a summary of the main issues raised in those representations. For completeness the council has also produced two full schedules of representations received from this consultation – one in policy order and one in alphabetical order by respondent.

2.28 As part of the most recent Local Plan 2041 Regulation 19 consultation it was made clear to respondents that they should submit their representations again, even if they had commented on the previous Regulation 19 Plan, as this was the final version of the plan that the council would be submitting for examination and the representations made at this stage would be the ones considered through the examination process.

2.29 Therefore, this Regulation 22 Consultation Statement focuses solely on the representations received to the Local Plan 2041 consultation. It summarises the main issues raised for each policy or site and provides a high level response to those issues. For the avoidance of doubt, the main issues have been compiled as a guide to the themes raised by respondents to assist the Inspector. They are not intended to cover every single point raised in representations, the full schedules of which have been submitted alongside the plan.



3. Pre-submission Plan (2041) Consultation Process

Explaining the process

3.1 The Pre-submission Plan consultation is known as the Regulation 19 stage in the plan-making process. This is a specific stage in the process and is different to previous stages. Regulation 19 is part of the Town and Country Planning (Local Planning) (England) Regulations 2012. It states that, before submitting a draft Local Plan to the Government's Planning Inspectorate for independent examination, the council must publish a draft of the Local Plan and formally invite representations on it. This consultation asked respondents to consider whether the Local Plan policies are:

- Legally Compliant - does the plan meet the legal requirements made under various statutes?
- Sound - has the plan been positively prepared, is it justified, effective, and consistent with national policy?
- Meet the Duty to Cooperate - has the council engaged and worked effectively with neighbouring authorities and statutory bodies?

3.2 This means that specifically, the council were asking people to consider whether the policies and proposals in the Plan meet these tests when making a representation.

Who was consulted?

3.3 Consultation material was made available to a wide range of organisations and individuals and in a range of ways, in accordance with the Council's Statement of Community Involvement. Those consulted include the following:

- Statutory consultees
- Parish and town Councils
- Developers and agents
- Local organisations
- General public (including residents and businesses)



- Contacts on the Council's planning consultation database
- Adjoining Local Authorities and Duty to Cooperate partners.

3.4 Consultation with these groups was undertaken through a variety of means including emailing nearly 10,000 people on the planning policy database, press releases, posts on social media and briefings and meetings with various stakeholder groups.

How we consulted

3.5 The consultation on the Local Plan 2041: Pre-submission Plan commenced on 30 October 2025 and ran for 6 weeks until 12 December 2025. During this period a range of consultation methods were used to inform stakeholders of the consultation, maintain interest and momentum in the process and engage with as wider a range of stakeholders as possible. The following methods were used to consult:

Press/publications/information

- Article published on 14 November 2025 in North Somerset Life online publication E-life which reaches approximately 97,000 people across North Somerset.
- Articles were also put in 'In North Somerset' (newsletter for the business community), The Knowledge (internal newsletter for North Somerset Council), Members Only (newsletter for Members), Town and Parish Digest (newsletter for towns and parishes).
- Media releases throughout the consultation period:
  - Council calls for fair, infrastructure-led growth as government housing targets drive new developments | North Somerset Council
  - Consultation starts on new North Somerset housing and employment targets | North Somerset Council
  - Two weeks left to have your say on North Somerset Local Plan 2041 | North Somerset Council

Libraries

- Hard copies of the Pre-submission plan, Policies Map and relevant information as required by the regulations were placed in all the libraries in North Somerset for the duration of the consultation. This included:



- Campus Library
- Clevedon Library
- Congresbury Community Library
- For All Healthy Living Centre Library
- Nailsea Library
- North Somerset Studies Library
- Pill Library and Children's Centre
- Portishead Library
- Weston-super-Mare Library
- Winscombe Library
- Worle Library and Children's Centre
- Yatton Library and Children's Centre
- Mobile Library

Social Media

- Eleven posts were released in the lead up to and throughout the duration of the consultation across four different platforms – Facebook (5 posts), Bluesky (four posts), Nextdoor (one post) and LinkedIn (one post).
- The total reach for these posts was 35,000 accounts (data not available for Bluesky).
- The posts generated 490 linked clicks to the consultation.
- The content was shared or reposted 60 times.

Website and online consultation

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



- This information, with a link to the website and to the online consultation system, was sent out to 9,849 stakeholders who were registered on the Planning Policy database on 30 October 2025. The database includes parish councils, adjacent authorities and parishes, planning agents, statutory consultees, local pressure groups and organisations as well as individuals/residents.
- Further reminder e-mails were sent out on 18 November 2025 and 5 December 2025 to all the stakeholders on our database to remind and encourage people to respond.

Meetings with stakeholders

There were a number of meetings with stakeholders which took place before and during the consultation period to discuss the issues identified in the Pre-submission plan. These included:

- Agents Forum – 10 December 2025. Meeting briefing local agents on the contents on the local plan and advising how to respond.
- Town and Parish Council Workshop – 4 December 2025. Meeting briefing town and parish councils on the contents on the local plan and advising how to respond.
- Regular meetings with neighbouring authorities, statutory consultees and other key stakeholders to alert them to the upcoming consultation and discuss key issues through the duty to co-operate.
- Bespoke meetings and engagement with town and parish councils and local residents groups in areas where the plan proposes strategic growth locations; including Wolvershill (north of Banwell), Woodspring (south west of Bristol), Nailsea and Backwell, and Pill and Easton-in-Gordano.

Level of response.

3.6 There were1,492 respondents to the consultation with a total of 3,538 comments made. All comments are available to view in the Schedules of Responses either against each policy or for each respondent.



Town and Parish Councils

3.7 20 town and parish councils responded to the consultation (out of 39) with many of their comments mirroring the responses of the wider community within each area. Those that responded were:

- Abbots Leigh Parish Council
- Backwell Parish Council
- Barrow Gurney Parish Council
- Bleadon Parish Council
- Brockley Parish Council
- Burrington Parish Council
- Butcombe Parish Council
- Churchill Parish Council
- Cleeve Parish Council
- Flax Bourton Parish Council
- Hutton Parish Council
- Kenn Parish Council
- Long Ashton Parish Council
- Nailsea Town Council
- Pill and Easton-in-Gordano Parish Council
- Portishead Town Council
- Winford Parish Council
- Wraxall and Failand Parish Council
- Wrington Parish Council
- Yatton Parish Council



Omission Sites

3.8 There were around 50 sites submitted to the consultation for consideration as potential allocations for various uses, but predominantly housing. These were all resubmissions of sites which have been assessed though the Strategic Housing Land Availability Assessment (SHLAA), noting some changes to boundaries and capacities have been promoted. These sites are listed under the summary for Policy LP5: Housing and Employment Allocations.



4.Summary of Main Issues Raised

4.1 The following tables are a summary of the main issues raised during the consultation for each policy and site where comments have been made, and a high-level response to those issues prepared by council officers to assist the Inspector. For some policies there were either no issues or objections raised or no responses and therefore they do not feature in the summary tables below These policies are:

- LP21: Coastal Change Management Areas – only 1 comment received from the Environment Agency supporting the policy approach.
- DP13: Environmental pollution, living conditions, health and safety – 1 comment from the coal authority supporting the inclusion of reference to land instability and land affected by former underground or mineral workings in the justification to the policy.
- DP22: Visitor Attractions - 1 comment received from the Environment Agency supporting the policy approach.
- DP23: Visitor Accommodation - 1 comment received from the Environment Agency supporting the policy approach.
- DP25: District Centres – No comments received.
- DP27: Primary shopping areas – No comments received.
- DP28: Retail parks – No comments received.
- DP29: Sequential approach for town centre uses – No comments received.
- DP33: Disposal of waste by landfill or land raise – No comments received.
- DP56: Equestrian development – 1 comment received from the Environment Agency supporting the policy approach.

4.2 While the summaries represent officers' best efforts to fairly and clearly identify the main issues, they should be regarded as guides only. They will, most likely, not cover every individual representation and are not a substitute for reading the full and comprehensive set of all duly made representations.



4.3 Modifications that have been suggested in representations are also listed in the tables, again noting that these summaries are not claimed to be comprehensive and are intended to be a helpful guide. The full wording of modifications proposed in representations are contained within the Regulation 20 consultation response reports, available to view in policy or respondent order.



Vision, Strategic Policies and Sustainability Objectives

Vision

Vision	
Number of representations received: 42	
Number of objections based on policy being unsound: 29	
Not positively prepared: 14 Not justified: 19 Not effective: 17 Not consistent with national policy: 16	
Number of objections based on policy being not legally compliant: 7	
Number of objections based on policy being not compliant with Duty to Co-operate: 12	
Main Issues Raised:	**North Somerset Council Officer Response:**
Loss of agricultural land will affect local, regional and national food production. The local plan must actively support current and future farming, food production and food security. **(C Butler, Rich Coleman)**	Noted. Our Best and Most Versatile Land Background paper explores this issue, and Policy DP53 responses appropriately.
Comments regarding the consultation process, that this has not been advertised widely enough, and does not comply with the Public Sector Equality Duty. **(Gill Bennett, Jenny Ingram, L Harrisis, Lucy Byrne, Maureen Butterly, Sustainable Pill & District)**	As explained in the consultation statement, extensive engagement has taken place throughout the plan-making process, in accordance with the regulations and supplemented by further activity. An equalities impact assessment has been published at each stage. We note the observations regarding digital reliance but can confirm that we have ensured access to paper copies of documents, and accepted responses submitted by post.
The plan period should be extended. **(Gleeson Land, Home Builders Federation, Innova Consulting Services, Marcus Plaw - Persimmon Homes, Mead Realisations Ltd)**	Some respondents suggest a short extension to ensure a 15-year horizon from the point of adoption, whilst other comments advance the suggestion of a 30-year plan period. Plan-making commenced for this local plan in 2020, and the plan period has been rolled forward on occasions since given the shifting national policy context. It is the council's position that the plan period is adequate, and the anticipated adoption of the plan will take

	place in year 1 of the 15-year period. It is imperative that this plan be in place as quickly as possible given it will deliver a significant level of much needed housing over its period and though the plan led system.
The vision does not respond to the clear and evidenced need for the council to plan for strategic employment needs. **(Hallam Land)**	The high-level vision does refer to the delivery of new jobs over the plan period, and the plan makes provision for sufficient employment land to be delivered to meet our evidenced needs.
General opposition to level of housing growth, or specific site allocations. **(Giacomo Squintani, M Clarke, M Staines, Malcolm Reed, Nick Bowler, Trevor Watts, Wayne Davey, William Hall)**	Noted. Responses to detailed objections to housing growth and individual sites are listed under Policies SP8 and Schedule 1 respectively.
The vision is aspirational only and lacks measurable commitments. It does not explicitly state that the Council will meet its full housing requirement. **(Marcus Plaw - Persimmon Homes, Mead Realisations Ltd, St Philips)**	The plan is clear that the vision is our aspiration as to what good development will look like in the future and reflects the corporate values of open, fair and green. Policies in the plan then set measurable targets – for example SP8: Housing.
Concern that the vision sets a 'one-size fits all' agenda that does not recognise local distinctiveness of settlements within the district. **(T Crane)**	The vision is an overarching aspiration as to what good development will look like in the future across the district as a whole. Separate strategic policies are in place for towns and villages and rural areas.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support for the vision statement. **(Councillor Bridget Petty, Gladman Developments, R Storrar)**	Support welcomed.
Support the vision statement, however consider proposed allocations contrary to it. **(Giacomo Squintani, Trevor Watts, William Hall)**	Noted.
Support the vision however suggest contextual background information is included within this section of the plan. **(Mac Mic Strategic Land – Backwell, Mac Mic Strategic Land – Land north of Banwell Road)**	Support welcomed. This is not considered necessary, as the suggested information (population, demographics, etc) is subject to frequent change would likely quickly become out of date.



Suggested modifications:

Create protective farming, food production and food security policies across all NSC policies.
(C Butler)

Create strategic gaps around all urban areas to protect rural agriculture/farming communities.
(C Butler)

Extend the plan period. Some respondents request a short extension to ensure 15-year horizon from adoption, other suggestions advance a 30-year plan period.
(Gleeson Land, Home Builders Federation, Innova Consulting Services, Marcus Plaw - Persimmon Homes)

Suggest contextual background information is included within this section of the plan.
(Mac Mic Strategic Land – Backwell, Mac Mic Strategic Land – Land north of Banwell Road)

The Vision should be reworded to include: "By 2042 [an extended plan timeline], North Somerset will be a thriving, sustainable district that meets its full housing requirement and supports inclusive growth. The Local Plan will deliver a mix of homes, employment opportunities, and infrastructure, ensuring development is well-connected and suitably sited, resilient to climate change, and which enhances the quality of life for all communities. These commitments as presented will be monitored and the plan reviewed to respond to address any shortcomings or shortfalls affecting the Plans effectiveness."
(Marcus Plaw - Persimmon Homes)

It is suggested that the Pre-submission Plan (PsP) includes specific text confirming that: 'The Council will review the plan no later than 5 years from the date of adoption'.
(Mead Realisations Ltd)

It is noted that the vision does not include a clear commitment to providing new homes to meet the needs of North Somerset's residents, and we would suggest that the vision would be strengthened by making such a statement.
(St Philips)

Tailor the vision to recognise the distinct identities and challenges of North Somerset's settlements. It should set differentiated priorities for deprived urban areas, coastal towns, rural villages and commuter settlements.



(T Crane)

The statement should be amended to include “responsible attitude to nature recovery”
(YACWAG)



Strategic Priorities

Strategic Priorities	
Number of representations received: 20	
Number of objections based on policy being unsound: 29	
Not positively prepared: 14 Not justified: 9 Not effective: 9 Not consistent with national policy: 7	
Number of objections based on policy being not legally compliant: 7	
Number of objections based on policy being not compliant with Duty to Co-operate: 12	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that some of the proposed allocations in the plan conflict with the strategic priorities listed. **(Gerry Dawson, Maureen Butterly, N Whiteley, Peter Sims, William Hall)**	Responses to detailed objections to particular housing sites are listed under Schedule 1.
There is a lack of place-specific nuance in the priorities listed, a single list of generic priorities does not reflect the different areas across North Somerset. **(T Crane)**	These overarching priorities directly influenced the development of the spatial strategy and the broad distribution of growth. Separate strategic policies are in place for towns and villages and rural areas.
Support/Other Comments:	**North Somerset Council Officer Response:**
Broad support for the strategic priorities. **(Backwell Parish Council, Nailsea Town Council, Flax Bourton Parish Council, Brockley Parish Council, Backwell Residents Association, Nailsea Action Group, Councillor Bridget Petty, St Philips)**	Support noted.



Suggested modifications:
Amend first sentence to state “nature and climate emergencies” They are related issues but the need for nature recovery is as important and also importantly something that we do have a lot more control of through appropriate land use. (YACWAG)



Sustainable development objectives

Sustainable development objectives	
Number of representations received: 19	
Number of objections based on policy being unsound: 11	
Not positively prepared: 8 Not justified: 7 Not effective: 6 Not consistent with national policy: 4	
Number of objections based on policy being not legally compliant: 3	
Number of objections based on policy being not compliant with Duty to Co-operate: 3	
Main Issues Raised:	**North Somerset Council Officer Response:**
New homes must be built to meet the highest environmental standards and designed to minimise the need for private car use, and reduce carbon emissions. **(Alistair Ireland)**	These principles are factored into the sustainable development objectives, and other policies in the plan provide standards and further detail that proposals must accord with.
General objections to the allocation of particular sites, and that these conflict with the sustainable development objectives. **(Kelly Packham, Lizzie Slocombe, Maureen Butterly, Guy Stone, Nailsea Action Group, Nick Bowler, Rob Hookham, William Hall)**	Responses to detailed objections to particular housing sites are listed under Schedule 1.
No reference is made to food security. **(Rich Coleman)**	Best and Most Versatile Land is considered through objective 1.3: promote the optimal use of land which supports regeneration, maximises re-use of previously developed (brownfield) land and protects the rural economy.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support the sustainable development objectives. **(Councillor Bridget Petty, Paul Segar, St Philips, Wrington Parish Council)**	Support welcomed.
Suggested modifications:	
None	



Strategic Policies

Strategic Policies - General Comments

Strategic Policies – General Comments	
Number of representations received: 18	
Number of objections based on policy being unsound: 8	
Not positively prepared: 4 Not justified: 7 Not effective: 5 Not consistent with national policy: 6	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate 2	
Main Issues Raised:	**North Somerset Council Response:**
The whole plan needs stronger evidence for climate and nature recovery and needs to be more strongly aligned with the NPPF on climate, biodiversity and green infrastructure principals. **(Andy Chappell)**	The local plan policies align with the NPPF and the evidence base contains many documents regarding climate change and nature recovery such as the Green Infrastructure Strategy, Habitat Regulations Assessment and evidence regarding net zero construction.
Concern over the scale of development and the impact it will have on ecology particularly SSSIs ancient woodland wildlife corridors etc. **(N Shelton)**	The evidence base which accompanies the plan supports the level of growth proposed with appropriate mitigation required at a district wide, as well as site specific level, to address any environmental or ecological impact of the proposed development.
Objections to level of growth at Nailsea and Backwell and its designation as a strategic growth location. **(Backwell PC Nailsea TC Flax Bourton PC Brockley PC Backwell RA Nailsea Action, Ian Hunter, Jenny Leavett)**	As a main town in North Somerset, Nailsea is a focus for development in line with the spatial strategy. Backwell is located close to Nailsea with train station serving both settlements. As such Nailsea and Backwell were identified as a strategic location early in the preparation of the new local plan.
Concern that the distinction that has been made between Strategic Policies and non-strategic policies is unclear. At the very least the term strategic policy, not the prefix SP should be used to identify	The NPPF (para 20 and 21) states that the plan should contain strategic policies and the plan should make explicit which are the strategic policies. The North Somerset Local Plan does this in accordance with national

each strategic policy. The distinction between Strategic and non-strategic policies reflects a misunderstanding of the purpose of such a distinction and how this relates to planning applications and planning appeals. Some of the Strategic policies seem to be statements of intent or ambition and/or are merely foreshadowing detailed non-strategic policies later in the Plan. The wording of policy should set out what developers need to demonstrate in order should compliance with the policy. Any policy wording that does not assist a planning applicant or a decision-maker should be removed from policy and moved to the supporting text or just deleted. **(Home Builders Federation)**	guidance.
Concerns regarding food security and the increased risk of flooding by building on agricultural land **(J Dyson, Rich Coleman)**	The Best and Most Versatile Land background paper that was published as part of the evidence base justification has been provided for those allocations for residential use on land that has been classified as BMV. The identification of these sites is further supported by the sustainability appraisal. Coupled with a policy approach to protect the remaining BMV land from speculative developments this is considered to be a proportionate approach to this issue.
Wrington is not a suitable location for growth as it is unsustainable **(Jessica Storrar)**	No new allocations are proposed at Wrington.
The Strategic Policies form the backbone of the Local Plan and must demonstrate a coherent, evidence-led approach to the spatial distribution of development. While the stated intentions of the strategic policies are appropriate in principle, the overall strategy – particularly as implemented through the spatial strategy (SP3), villages policy (SP6), Green Belt policy (SP7), housing strategy (SP8) and transport strategy (SP10) – does not align with the evidence base or with national policy tests of soundness. **(Maureen Butterly)**	The evidence base supports the strategic policies in the plan and the spatial strategy.
Objection to housing allocations at Tower Farm and Black Rock **(William Hall and Eric Arsenault)**	The scale of objection to this allocation is noted and understood. Detail responses to themes raised are set out in the schedule for each site at the end of this document.



Concern about housing developments in Elborough. **(Nick Bowler)**	Detail responses to themes raised are set out in the schedule for each site at the end of this document.
Support/Other Comments:	**North Somerset Council Response:**
We support the final spatial strategy which was created following an iterative process, backed by evidence and with good public and wider interested party engagement. **(Aston and Co)**	Comments noted.
The Local Plan is correct in identifying where development should take place, keeping it within easy reach of established city/town centres. **(R Storrar)**	Comments noted.
Suggested modifications:	
Wording of the Strategic Policies should be re-visited to make them more specific. **(Home Builders Federation)**	



SP1: Sustainable development

Policy SP1: Sustainable development	
Number of representations received: 48	
Number of objections based on policy being unsound: 31	
Not positively prepared: 20 Not justified: 25 Not effective: 26 Not consistent with national policy: 20	
Number of objections based on policy being not legally compliant: 4	
Number of objections based on policy being not compliant with Duty to Co-operate: 10	
Main Issues Raised:	**North Somerset Council Officer Response:**
The plan does not provide any contribution towards meeting unmet needs arising from Bristol. **(Miller Homes)**	This is addressed under Policy SP8: Housing.
Policy considered unnecessary duplication of national policy. Concern that it is too high level and many of the bullet points in the policy will not be relevant to all types of development. It is unclear how a developer would demonstrate compliance with this policy. **(Bellway Homes, Wain Estates, Bloor Homes, Home Builders Federation, Mead Realisations, Taylor Wimpey Crest Nicholson Barratt Redrow and Vistry Group)**	Disagree. This policy sets the overarching local context for what sustainable development means for North Somerset. The principles are inevitably high level but highlight local priorities that are then reflected in detail in other policies. There is no intention nor expectation that all planning applications will be required to address all of the criteria in the policy.
Sustainable development should prioritise compact growth, brownfield regeneration and focus on locations where services and facilities are already located. **(Cllr Thomas Daw)**	Other policies in the plan, most notably SP3: Spatial Strategy, address this.
Suggestions that the spatial strategy does not align with the sustainable development principles set out in this policy, and promotion of omission sites. **(Harrow Estates, Wall Holdings Ltd)**	The policy sets out broad principles for sustainable development. Issues around the appropriate balance between towns, villages and particular settlements are addressed in Policy SP3: Spatial Strategy.



Additional detail should be added to the policy prescribing that development should be within or close to urban or built-up areas. **(Persimmon Homes)**	This level of detail is unnecessary in this overarching policy.
This policy should only apply to large sites as it will place an unnecessary burden on small windfall sites. **(R Burrows, Dan Clarke-Hall – Gibson Architecture)**	Disagree – it is important for development of all scales to be sustainable. The policy does not place any undue burdens on development.
Suggested that specific reference should be made to the NPPF in the policy with a caveat that the latest NPPF definition of sustainability is used at point of decision making. **(Bloor Homes)**	This is considered unnecessary as, for the purposes of decision-making, the current NPPF at the time will be considered in any event.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support for the broad objectives in this policy as an overall framework for the Local Plan. **(Autograph Homes, Backwell PC Nailsea TC Flax Bourton PC Brockley PC Backwell RA and Nailsea Action Group, Environment Agency, R Storrar, Stephanie Fowler, Strongvox Ltd, Taylor Wimpey)**	Support welcomed.
Commitment to net zero is commendable however any requirement must not go beyond government targets. **(McCarthy Stone & Churchill Living)**	This policy does not prescribe any targets. This issue is addressed in Policy SP2.
Support use of the word 'should' in the opening sentence. **(Diverse Partnerships Yatton Ltd, Stephanie Fowler, Strongvox Ltd, Taylor Wimpey)**	Noted.
Support the notion that a variety and choice of housing should be delivered. **(Nathan Price)**	Noted.
Support from National Highways for the objective to maximise the use of effective public transport and encourage the creation of liveable neighbourhoods. **(National Highways)**	Support noted.



General observations regarding climate change, net zero and food security. **(M Slade)**	These matters are addressed through other policies, most notably SP2: Climate Change.
Concerns that development around the villages would not accord with this policy due to a lack of infrastructure. Particular references are made to Congresbury and Pill and Easton-in-Gordano. Other comments made on the spatial strategy and the identification of sites around areas such as Portishead, Nailsea and Banwell. **(Adrian Mealing, Maureen Butterly, Miller Homes, Woodstock Homes, Nailsea Action Group, Paul Kent, CJ Waite)**	The identification of sites in accordance with a hierarchy is addressed under Policy SP3: Spatial Strategy.
Support that the plan does not identify allocating sites in Wrington that were previously considered. **(B Mill, Chris Segar, Jacinta Magee, Paul Segar, R Storrar, Susie Marwood, Tony Harden)**	Noted
Lack of reference to food security. **(Rich Coleman)**	Protection of best and most versatile agricultural land is covered in Policy DP53.
The plan does not provide any contribution towards meeting unmet needs arising from Bristol. **(Miller Homes, Wall Holdings Ltd)**	This is addressed under Policy SP8: Housing.
Suggested modifications:	
Suggest this policy is deleted, or replaced with an overarching policy that sets out that applications should accord with the policies in the plan, and where they do not they could be refused unless other material considerations indicate otherwise. **(Bellway Homes Ltd, Home Builders Federation)** It is suggested that specific reference is made to the NPPF (and a caveat included that the latest NPPF/government definition of sustainable development should be used at the time of decision making, and the policy shortened to focus on what sustainable development means locally. **(Bloor Homes)** Detailed wording changes proposed – see representation **(Mead Realisations)**	



The policy should be amended to read:
- Prioritise walking and cycling, maximise the use of effective public transport and encourage the creation of liveable neighbourhoods through the location of development within or close to urban or built up areas.
(Persimmon Homes)

Amendments suggested to the spatial strategy and identification of particular sites.
(Maureen Butterly)

Inclusion of the words 'new development for 10 or more dwellings'.
(R Burrows, Dan Clarke-Hall – Gibson Architecture)

This should not be a policy, it should be supporting text within the plan.
(Taylor Wimpey Crest Nicholson Barratt Redrow and Vistry Group)



SP2: Climate Change

Policy SP2: Climate Change	
Number of representations received: 54	
Number of objections based on policy being unsound: 31	
Not positively prepared: 21 Not justified: 30 Not effective: 30 Not consistent with national policy: 27	
Number of objections based on policy being not legally compliant: 5	
Number of objections based on policy being not compliant with Duty to Co-operate: 12	
Main Issues Raised:	**North Somerset Council Officer Response:**
The allocations in Congresbury cannot comply with the policy's principles, therefore it is ineffective. The allocations require infrastructure to meet climate change objectives, yet no delivery mechanism is provided. (**Adrian Mealing)**	SP2 is a strategic policy setting out the strategic framework for more detailed policies within the plan. Any planning application for allocations in the plan will have to comply with the development policies in the plan.
The policy expectations include the phrases minimise and maximise, which sets open ended requirements which have not been viability tested. Instead, specific requirements should be included within DM policies, where they have been appropriately tested. The policy fails to provide any criteria against which a development could be assessed, nor what evidence is required to show compliance. **(Ainscough Strategic Land, HBF, Wain Estates Wolvershill, Rubix Strategic Land, Vistry Group)**	SP2 is a strategic policy setting out the strategic framework for more detail policies within the plan. Specific requirements have been set out in numerous development management policies such as DP5, DP6, DP7, DP9, DP15, DP16, DP17, DP34, DP35, DP36 and DP37. A viability assessment which has assessed the requirements of all the policies in the plan has been undertaken and none of the policy requirements impact on whole plan viability.
The mechanisms for achieving carbon neutrality by 2030 are not fully evidenced. Monitoring and enforcement of climate measures is unclear and needs to be a requirement. Strategic developments should be required to submit a Carbon Reduction Implementation Plan and quantify whole development carbon impacts. Policy	SP2 is a strategic policy setting out the strategic framework for more detail policies within the plan. Specific requirements and mechanisms for achieving SP2 have been set out in numerous development management policies in the plan such as DP5, DP6, DP7, DP9, DP15, DP16, DP17,



wording should explicitly state that climate policy requirements cannot be reduced on viability grounds. The policy should strengthen integration with nature-based solutions and the Local Nature Recovery Strategy. **(Andy Chappel)**	DP34, DP35, DP36 and DP37. The policies listed refer to nature-based solutions and the Local Nature Recovery Strategy. North Somerset Council also has a Climate Emergency Strategy and Climate Emergency Action Plan to monitor progress in moving towards carbon neutrality by 2030. These are available to view on the Climate Emergency webpages.
The expectation that net zero should be achieved in all new buildings is unrealistic and unreasonable (especially in the context of a grid in the process of decarbonisation), and alternatives have not been explored. **(Autograph Homes, Bellway Homes, Gleeson Land, Taylor Wimpey Land at Grove Farm Backwell, Taylor Wimpey Youngwood Lane, Strongvox, Stephanie Fowler, Verto Homes, Mead Realisations, Marcus Plaw Persimmon Homes)**	The expectation to deliver a net zero energy standard in new buildings reflects the council's ambition to be carbon neutral by 2030 and is set out in the Climate Emergency Strategy and Action Plan. Further detail on this requirement is set out in responses to DP6: Net zero construction.
The policy should be introduced in a proportionate manner and at a reasonable point in time to ensure the requirements do not delay the delivery of housing. **(Autograph Homes, Bellway Homes, Gleeson Land, Taylor Wimpey Land at Grove Farm Backwell, Taylor Wimpey Youngwood Lane, Strongvox, Stephanie Fowler, Verto Homes, Mead Realisations, Mac Mic Strategic Land – Backwell, Mac Mic Strategic Land – Land north of Banwell Road)**	There is no reason why the policy should delay the delivery of housing.
A separate strategic policy addressing the climate emergency is unnecessary. Climate change policies are better placed in DM policies. It is inappropriate to require every development to meet every criterion, some will not be relevant and some will be superseded by national policy. The PPG considers that locally set energy performance standards should not exceed Level 4 of the Code for Sustainable Homes. It is critical that the criteria attached to	In 2019 North Somerset Council declared a climate emergency. Tackling climate change and reducing carbon emissions is a key objective for North Somerset Council which is set out in the council's corporate plan. The NPPF (para 20) identifies "planning measures to address climate change mitigation and adaptation" as a strategic policy matter.



the policy are consistent with National Policy **(Bellway Homes, Autograph Homes, HBF, Taylor Wimpey/ Crest Nicholson/Barratt/Redrow/Vistry, Mac Mic Strategic Land – Land north of Banwell Road)**	
Welcome the commitment to reduce the overall environmental impact of development and maximise water reuse and the protection of water resources. LPA must ensure that water efficiency, rainwater harvesting and greywater use are key priorities. There are opportunities for Green and Blue Infrastructure, and the implementation of Nature-based Solutions should be encouraged and maximised, and integrated into policies and design principles for new development where appropriate. Development should be phased so that any new water infrastructure is in place prior to occupation. LPA must also target development to areas of water surplus, and adopt the tighter building regulation water efficiency standard of 110l/p/d in the relevant plan policy. **(Environment Agency**)	Comments noted and many of the points raised are addressed through the development management policies in the plan. Policy DP6: Net zero construction states: *"All residential development must demonstrate measures to minimise potable water use and will need to achieve a water consumption standard of no more than the optional requirement of 110 litres/per person/per day as set out in Building Regulations Approved Document Part G. All measures will optimise water use and may include water efficient fittings, rainwater harvesting and other mechanisms for recycling and reusing water on-site*".
There is no climate crisis, and it is being challenged in scientific circles. Net zero is not viable and is bad for the economy. **(Chris Hollebon, M Slade, Rich Coleman, Fran Slade**)	The Intergovernmental Panel on Climate Change website provides some useful information on the climate crisis. The net zero construction policy requirements have been viability tested as part of the whole plan viability assessment, and they do not impact on the overall viability of the plan.
The use of discretionary language leaves critical requirements insufficiently guaranteed. The evidence base is inadequate or incomplete in several areas including climate-adaptation measures. Requirements for design consistent with SP2 need to be made mandatory for developers. **(Cleeve Parish Council)**	The policy wording allows for flexibility in the implementation of the policy.
The policy should be justified by robust evidence which considers viability with reference to the relevant Building Regulations and the emerging Future Homes Standard which offer the most appropriate mechanism to deliver low carbon and energy efficient developments.	The NPPF (2024) is clear that Local Plans should "*take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from*



It is important to recognize that mitigating and adapting to climate change must also be compatible with other important objectives for the planning system, including the requirement to boost housing delivery and build a strong competitive economy. The current approach risks undermining national policy objectives and is not consistent with National Policy. **(Gladman Developments, HBF, Taylor Wimpey/Crest Nicholson/Barratt/Redrow/Vistry, Vistry Group, Mac Mic Strategic Land – Backwell,**	*rising temperatures*" (para 162.) The North Somerset Local Plan meets its housing requirement boosting housing delivery, whilst taking account of climate impacts and protecting and enhancing the natural environment.
The NPPF refers to low carbon rather than zero carbon. Where net zero is achieved, the NPPF directs this this should be given significant weight in the planning balance, if all developments are to achieve net zero it detracts from this benefit weighting. **(Gleeson Land, Verto Homes)**	The NPPF states "*The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure*". (Para 161)
Active travel will never be achieved in Nailsea/Backwell if large housing allocations go ahead as this will result in more journeys. **(Jeanne Craske)**	Policy LP3: Nailsea and Backwell and DP15: Active and sustainable transport require developments to prioritise active travels modes as part of the design of their developments.
This policy fails to provide any criteria against which a development proposal could be assessed. For example, the policy seeks a reduction in greenhouse gases but doesn't specify by how much, it seeks maximum water re-use and minimal energy use but no reference is made to any targets. As it is unclear what the Council means in terms of these maximum and minimums, and the Plan provides no policy, advice or guidance on what evidence would be required to show compliance, the policy is both unjustified and ineffective and should be deleted. **(Home Builders Federation)**	SP2 is a strategic policy setting out the strategic framework for more detail policies within the plan. Specific requirements have been set out in numerous development management policies such as DP5, DP6, DP7, DP9, DP15, DP16, DP17, DP34, DP35, DP36 and DP37.
A number of points are not described or explained in sufficient detail to confirm how effective the plan is; Carbon Neutral by 2030 – how can this be delivered with all the thousands of additional houses and	The Local Plan strikes a balance between delivering housing and economic growth and ensuring the policies are in place to deliver development sustainably.



road building, which will both require huge amounts of concrete, a man made substance that has a huge carbon footprint. **(John Turner)**	
It is important we consider sustainable approaches to urban development, but net zero is far too ambitious. Solar panels should be put on building roofs rather than prime agriculture and green belt that threatens food security. **(M Slade)**	North Somerset has the ambition to be net zero by 2030 and the NPPF states "*The planning system should support the transition to net zero by 2050".* It is therefore important that policies in the plan support this approach
As worded, this policy is unsound, and not consistent with national policy. The policy appears to apply to all development which would be unreasonable and unworkable and adds to the work required in supporting a planning application, which would add to an increase in time taken to determine applications. The policy should be made clearer to ensure it does not place excessive burdens on applicants in terms of cost and time. **(Marcus Plaw Persimmon Homes)**	SP2 is a strategic policy setting out the strategic framework for more detail policies within the plan. Specific requirements have been set out in numerous development management policies such as DP5, DP6, DP7, DP9, DP15, DP16, DP17, DP34, DP35, DP36 and DP37.
It is not clear whether the second paragraph of the policy is seeking to consider the overall environmental impact, or on a case-by-case basis or some other variable, this needs to be clarified. The baseline relating to reducing greenhouse gas emissions needs clarity. In relation to water use it is not clear how this will be measure for DM purposes and needs to be clearly set out in the policy. The last bullet point encourages the reuse of existing buildings, but the practicalities of doing so have not been properly considered. **(Mead Realisations)**	The policy states: *"In order to reduce the overall environmental impact of development, proposals will be expected to demonstrate how they...."* and then lists the measures development is expected to take to mitigate the impacts of climate change. This is a clear expectation. This is a strategic policy and doesn't set out the details regarding the re-use of existing buildings. The policy sets out the principal that re-using existing buildings results in less carbon emissions than new build.
Recent housing developments on agricultural sites have already contributed to increased flooding and a loss of green infrastructure and biodiversity and should be avoided in future if at all possible. **(Paul Segar)**	The local plan contains policies, such as SP6, which limit development in the countryside. It also contains policies which protect and enhance the natural environment.
It is questioned how NSC will deliver windfall sites and small sites at all, the financial burden is already onerous. **(R Burrows)**	Viability testing in relation to the costs of this policy, and the requirements of all policies in the plan, has been undertaken.



The policy does not sit comfortably in the strategic policies section of the plan and is better covered by DM policies. Strategic policies should not extend to detailed matters and avoid unnecessary duplication of policies that apply to a particular area. **(Taylor Wimpey/Crest Nicholson/Barratt/Redrow/Vistry, HBF, Rubix Strategic Land)**	The NPPF (para 20) identifies "planning measures to address climate change mitigation and adaptation" as a strategic policy matter. Development management policies within the plan expand on how this strategic policy will be delivered and do not duplicate it.
It is inappropriate for every development to meet/demonstrate compliance with every policy criterion, the policy should be amended to acknowledge this. **(Verto Homes)**	SP2 is a strategic policy setting out the strategic framework for more detail policies within the plan.
BMV land should not be used for development **(YACWAG)**	Policy DP53 sets out the criteria for development on BMV land with very limited types of development allowed on grades 1 and 2 agricultural land.
Support/Other Comments:	**North Somerset Council Officer Response:**
I support the climate change policy. **(Cllr Bridget Petty)**	Comment noted and support welcomed.
The strategic policy is completely correct in identifying measures we need to mitigate and hopefully roll back some of the damage already done to the planet. To continue without adopting this policy and applying it to all the other listed policies is simply unsustainable and would have a very negative effect on the lives of future residents. **(R Storrar)**	Comment noted and support welcomed.
I agree particularly with prioritising active modes of transport and public transport over car use. **(Paul Segar)**	Comment noted and support welcomed.
I support these plans to protect the environment as part of the Councils Climate emergency commitments, and agree that we need better infrastructure for public transport which will lead to a reduction in carbon emissions. **(Nancy Wedin)**	Comment noted and support welcomed.
Fully support reuse of existing buildings and structures and support all measures to reduce flooding. **(Chris Segar**)	Comment noted and support welcomed.



Yatton Parish Council recommends a number of green measures when they respond to planning applications. It would be good to see a similar code embedded in North Somerset Council's planning process, but in the form of conditions that must be met. **(Yatton Parish Council)**	Comments noted.

Suggested modifications:

A number of developers propose the following amendments:

- *"~~Maximise~~ **Reduce** water ~~re~~-use and **prioritise** the protection of water resources;*
- *~~Minimise~~ **Reduce** energy use and deliver ~~a net zero energy standard in new buildings~~ **Net Zero Ready buildings**;*
- *~~Maximise~~ **Incorporate** the generation of energy from renewable and low carbon sources of energy"*

(Ainscough Strategic Land, Bloor Homes - North of Pound Lane Nailsea site, Bloor Homes South West, Rubix Strategic Land, Wain Estates)

SP2 should be amended to read, "…In order to reduce the overall environmental impact of development, **where relevant**, proposals will be expected to demonstrate how they:…" and then, "Minimise energy use and deliver a ~~zero~~ **low** carbon energy standard in new buildings.
(Bellway Homes, Gleeson Land, Verto homes)

Policy SP2 should state that climate change mitigation and adaptation measures will be delivered in accordance with national standards (including the Future Homes Standard) and phased to reflect technological and supply chain readiness. Local requirements will be subject to viability testing and consultation to ensure consistency with national policy and deliverability of the wider Local Plan objectives.
(Mac Mic Strategic Land)

This policy should be modified to reflect the reality and establish suitable parameters so that development can be assessed at a reasonable point in time to ensure the promotion of climate change resilience and minimising adverse environmental impacts of development**.**
(Strongvox, Stephanie Fowler, Taylor Wimpey)

The policy should be reworded to clarify to which applications it is applicable.
(Persimmon Homes)



SP3: Spatial Strategy

Policy SP3: Spatial Strategy	
Number of representations received: 90	
Number of objections based on policy being unsound: 60	
Not positively prepared: 42 Not justified: 54 Not effective: 58 Not consistent with national policy: 50	
Number of objections based on policy being not legally compliant: 18	
Number of objections based on policy being not compliant with Duty to Co-operate: 28	
Main Issues Raised:	**North Somerset Council Officer Response:**
Objection to the level of growth, especially around villages, and specific site allocations. Particular concerns over the strategic growth locations of Nailsea and Backwell and Pill and Easton-in-Gordano. General comments regarding infrastructure provision. **(Adrian Mealing, Andrew Luke, Backwell PC Nailsea PC Flax Bourton PC Brockley PC Backwell Residents Association and Nailsea Action Group, E Beacon, Easton-in-Gordano Parish Council, Eileen Johnson, Gill Bennett, Ham Green Residents and other supporters, Justin Saunders, K Riches, Kevin Payne, Maureen Butterly, Pill & Easton-in-Gordano Parish Council, Robert Faulkner, S Rickard-Hughes, T Crane, Wraxall and Failand Parish Council, Ruth Revell)**	The spatial strategy articulated in this policy sets the overarching approach that gives priority to the most sustainable locations, noting that there is a need to have a range of development opportunities across settlements to provide variety and choice, support delivery and meet local needs. Policy SP8: Housing deals with the overall housing requirement and quantum of development that is proposed. Comments regarding the strategic growth locations are addressed under policies LP1, LP2, LP3 and LP4.
Spatial Strategy fails to respond directly to the findings of the Sustainability Appraisal, which recommended an urban focus. **(Backwell PC Nailsea PC Flax Bourton PC Brockley PC Backwell Residents Association and Nailsea Action Group, Summerfield Homes Ltd, Miller Homes)**	The spatial strategy gives priority to allocating growth in and around urban areas but must recognise that some development will be needed around villages.



Requests to introduce a settlement hierarchy approach within the spatial strategy, like there is in the current development plan, giving more status to villages and setting out that development beyond the settlement boundaries of the main settlements and larger villages may be appropriate if additional housing supply is required over the plan period. Concerns with the limit on development at small villages to only meeting local community needs. **(Bellway Homes Ltd, Bloor Homes North of Pound Lane, Bloor Homes South West, Catesby Estates, Diverse Partnerships Yatton Ltd, Gleeson Land, Latimer Developments Ltd, Lichfields Bristol, LiveWest, Marcus Plaw – Persimmon Homes, Mead Realisations Ltd, Miles Estate, Summerfield Homes Ltd, Verto Homes, Wain Homes, Woodstock Homes)**	As the plan meets its identified housing requirement there is no longer the need for a policy approach which allows sites to come forward adjacent to settlement boundaries. As a strategic policy there is no need to define the principle of local community needs, as this may vary depending on the village. This assessment will be a matter of planning judgement, taking account of the development plan as a whole.
Concern regarding the approach to site selection in respect of 'minimising residential development in areas at risk of flooding now or in the future outside of the towns'. Reference to use of the words 'in the future' being ambiguous. Observations that some allocations are on land at risk of flooding. **(Diverse Partnerships Yatton Ltd, Mac Mic Strategic Land - Backwell, Mac Mic Strategic Land – Land north of Banwell Road, Marcus Plaw – Persimmon Homes)**	The approach to flood risk accords with national policy, which seeks to direct development away from areas at the highest risk of flooding now or in the future. The allocations on land in flood zone 3 are all within defined settlement limits of towns, and a sequential assessment of them has been undertaken, as detailed in the Flood Risk Sequential Test paper.
This policy is a statement of intent, rather than a policy as it fails to set out any criteria against which development will be assessed. Concerns that the wording is vague. **(Gladman Developments, Home Builders Federation, Nailsea Holdings LVA LLP)**	Disagree. This strategic policy sets out the overarching sequential approach to prioritising sustainable locations for development.
Spatial Strategy should refer to unmet needs from Bristol. **(Home Builders Federation)**	Disagree. This policy sets the overall framework and establishes key principles for sustainable development within North Somerset.
Spatial Strategy is skewed towards Weston-super-Mare, and more growth should be directed towards locations closer to Bristol, or to villages. **(Harrow Estates, Waddeton Park Ltd)**	It is appropriate for the spatial strategy, and subsequent distribution of dwellings, to prioritise Weston-super-Mare given the range of services, facilities, jobs and access to sustainable modes of transport that are in place within the town. The Spatial Strategy, Site Selection and Capacity



	Paper sets out the approach taken to identifying the most sustainable locations for growth.
Promotion of strategic employment allocation at Land East of Clevedon. **(Hallam Land)**	This is addressed under Policy SP9: Employment.
Sites within the National Landscape should not be discounted. **(Leigh & Glennie Ltd)**	National policy affords great weight to conserving and enhancing landscape and scenic beauty in National Landscapes. The process for discounting sites is set out in the Strategic Housing Land Availability Assessment Main Report.
The policy does not present the housing requirement or explain the distribution of development proposed. **(Marcus Plaw – Persimmon Homes)**	These matters are addressed in Policy SP8: Housing.
Support/Other Comments:	**North Somerset Council Officer Response:**
Broad support for spatial strategy/identification of particular locations for growth. **(Ainscough Strategic Land, Aston & Co, Autograph Homes, Barratt Bristol, Bellway Homes Ltd, Burrington Parish Council, Caroline Bennett, Catesby Estates, Chris Segar, Ciara Donegan-Davies, Kath Scargill, Lichfields Bristol, National Highways, Paul Segar, Parker Strategic Land, Phoenix Life Ltd, R Storrar, Rubix Strategic Limited, St Philips, Stephanie Fowler, Strongvox Ltd, Taylor Wimpey – Land at Grove Farm and Burnt House Farm Backwell, Taylor Wimpey – Youngwood Lane Nailsea, Wain Estates – Wolvershill, Dr. David Portas, Richard Stockham, Sally Bartlett, Shail Patel)**	Support noted and welcomed.
Support for the policy but request that it cross refers to DP9: Flood risk. **(Environment Agency)**	Support noted. The policy already includes the words: *Residential development in areas at risk of flooding now or in the future will be minimised outside the towns* and there is a cross reference to Policy DP9 in the justification.



Suggested modifications:

Amendment sought to remove Nailsea and Backwell as a strategic development location.
(Backwell PC Nailsea PC Flax Bourton PC Brockley PC Backwell Residents Association and Nailsea Action Group, Wraxall and Failand Parish Council)

Amendment sought to remove Pill and Easton-in-Gordano as a strategic development location.
(Pill and Easton-in-Gordano Parish Council)

Draft Policy SP3 should also be amended to read, "[…] "Beyond strategic development areas, the amount of development at villages and in the countryside will reflect the settlement hierarchy."
(Bellway Homes Ltd)

Requests to introduce a settlement hierarchy approach within the spatial strategy, setting out that development beyond the settlement boundaries of the main settlements and larger villages may be appropriate.
(Bellway Homes Ltd, Bloor Homes North of Pound Lane, Bloor Homes South West, Catesby Estates, Diverse Partnerships Yatton Ltd, Latimer Developments Ltd, LiveWest, Marcus Plaw – Persimmon Homes, Summerfield Homes Ltd, Verto Homes, Wain Homes, Woodstock Homes)

SP3 should be amended to read, "…well served by public transport. There will be a presumption in favour of locating residential development in a location close to a well-connected rail station…. Beyond strategic development areas, the amount of development at villages and in the countryside will reflect the settlement hierarchy.
(Gleeson Land)

Spatial Strategy should refer to Bristol's unmet needs.
(Home Builders Federation)

Recommend aligning the flood risk wording with the NPPF sequential and exception test framework.
(Mac Mic Strategic Land - Backwell, Mac Mic Strategic Land – Land north of Banwell Road)

Detailed wording changes proposed – see representation.
(Maureen Butterly)



The following amendments are suggested to Policy SP3: “Priority will be given to locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active and sustainable travel, particularly at locations which are currently, or have the potential to be, well served by public transport. Employment opportunities will be encouraged at accessible locations well-related to the urban areas and where sustainable transport opportunities can be maximised. Residential development in areas at risk of flooding now or in the future will be minimised outside the towns unless it can be demonstrated that it will be safe for its lifetime without increasing flood risk elsewhere. (To delete: Beyond strategic development areas the amount of development at villages and in the countryside will relate to local community needs.)
(Mead Realisations Ltd)

Policy SP3:
• Review, and adjust, the distribution of housing growth between the ‘towns’ and ‘villages and rural areas’ locations.
• Review and prioritise housing growth at the towns on land outside the Green Belt in accordance with the sequential approach to site selection that underpins the spatial strategy.
(Miller Homes, Wall Holdings Ltd)

Various requests for omission sites to be considered for allocation – these are addressed under Policy LP5.



SP4: Place-making

Policy SP4: Placemaking	
Number of representations received: 32	
Number of objections based on policy being unsound: 22	
Not positively prepared: 13 Not justified: 19 Not effective: 16 Not consistent with national policy: 18	
Number of objections based on policy being not legally compliant: 4	
Number of objections based on policy being not compliant with Duty to Co-operate: 7	
Main Issues Raised:	**North Somerset Council Officer Response:**
Some respondents felt that some allocations (e.g., Pill Green, Congresbury, Tower Farm, sites at Backwell and Nailsea) are incompatible with the policies emphasis on local character, integration, master-planning and placemaking, infrastructure provision and landscape protection. **(Adrian Mealing, Barbara Harland, E Beacon)**	The proposed allocations would need to accord with the requirements of SP4, as well as other policies in the plan, when they come forward for development.
Objection to the policy requirement to produce a Community Engagement Strategy (CES) for applications of 10 dwellings or more/1000 sqm. It was felt it was disproportionate and the threshold too low. This requirement is already set out in the councils Statement of Community Involvement and as such should be in supporting text or alternatively be set as part of the Council's local list of validation requirements, if justified (rather than a policy requirement to be set by the plan). **(Bloor Homes South West, Gleeson Land, Strongvox Ltd, Stephanie Fowler, Taylor Wimpey, Various Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group, Verto Homes, Persimmon Homes, St Philips)**	North Somerset Council places great importance on effective, meaningful engagement with local communities regarding development proposals across the district. Community Engagement Statements are an effective way to ensure communities are given the opportunity to engage with development proposals from the outset to help shape and inform development in their area.



Objection to policy requirement to submit certain schemes to a design review panel. It is felt it is imprecise and leaves uncertainty as to when design review panel referral would be expected. There should be no binding requirement on applicants to undertake this exercise and should only be where justified by the circumstances of the scheme. Furthermore, there is a cost implication to Design Review panels. This would be better stated in supporting text rather than the policy wording. **(Bloor Homes South West, Autograph Homes, Strongvox Ltd, Stephanie Fowler, Taylor Wimpey, Mead Realisations Ltd)**	It is important that the policy is flexible to respond to applications on a case-by-case basis. It would be too prescriptive to set out specific criteria for when a scheme maybe required to undergo review by a design review panel as this would not cover every eventuality. It is felt the approach taken in the policy is reasonable and proportionate and that this requirement should remain in the policy text to ensure it holds appropriate weight.
A strategic policy on design is unnecessary as design requirements are better set out in development management policies. The NPPF states "strategic policies 'should be limited to those necessary to address the strategic priorities of the area." **(Bellway Homes Ltd, Various Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group)**	Paragraph 20 of the NPPF states that *"Strategic policies should set an overall strategy for the pattern, scale and design quality of places…".* SP4 sets out the overarching strategic expectations for design quality within North Somerset and provides a clear framework for more detailed non-strategic policies within the plan.
The requirement to "reflect" local character could be interpreted to be restrictive – suggest amending the wording to "Respond to and complement" local character. **(Bloor Homes South West)**	The word "Reflect" is considered appropriate in the context of the overall policy.
This policy fails to provide clear criteria against which a development proposal could be assessed and is considered to be insufficiently clear and ambiguous which could potentially lead to misinterpretation or unnecessary delay at the development management stage. For example, the policy wording refers to the National Design Guide and other national advice, without specifying what this other national advice is. It is difficult to see how a developer would show compliance with this policy. **(Home Builders Federation, Mead Realisations Ltd, St Philip)**	SP4 is a strategic policy which sets out the overarching strategic expectations for design quality within North Somerset and provides a clear framework for more detailed non-strategic policies within the plan. Detailed criteria are set out in other policies within the plan such as DP1: High Quality Design.
Issue raised around interaction between SP4 and the placemaking/master planning at the Strategic Development Locations particularly with regards densities. **(St Philips)**	SP4 is a strategic policy which sets out the overarching strategic expectations for design quality within North Somerset. Strategic development locations have more detailed locational policies which set out the requirements for the development locations including detail around



	design, placemaking, master planning and density.
There should be a clearer commitment to aspects of placemaking including the securing of a sum of money for public art and culture via condition/S106 on developments over a certain scale. **(S Scott)**	The requirement for public art is set out in a number of policies in the plan, namely DP1: High quality design and LP1 and LP2 - the policies for the strategic locations at Woodspring and Wolvershill.
Support/Other Comments:	**North Somerset Council Officer Response:**
Make Traditional Architecture Design Codes the forefront focus as these will bring multi fold benefits on economic, ecological and environmental grounds for everyone. **(David Barton)**	Comment noted.
It is especially important to protect and enhance the local character of communities, such as Wrington, as unsympathetic development of smaller communities can easily override the local character and degrade the sense of place **(Paul Seagar)**	Comment noted.
I fully agree with the council about placemaking. The opinions of local residents should have much more weight, following a proper period of consultation and engagement. Developers should have to hold in person meetings to properly gauge the feelings of local residents. **(R Storrar)**	Comments noted and support welcomed.
Sport England would encourage development in North Somerset be designed in line with the Active Design Guide principles to secure sustainable design. This could be evidenced by use of the checklist. **(Sport England)**	Comment noted.



Suggested modifications:

To avoid unnecessary duplication, it is suggested that this policy is deleted. If the policy is retain the following suggested amendments are made to better reflect the NPPF:

- "Reflect, protect or enhance local character, including local heritage, ***subject to the balance of public benefits to be derived***…"
- "~~Reflect~~, ***Respond to and complement***, protect or enhance local character, including local heritage…"
- The word 'collaboration' should be replaced with 'consultation'
- Add 'relevant and appropriate' to the paragraph about Community Engagement Statements

(Bellway Homes Ltd, Verto Homes, Gleeson Land, Bloor Homes South West)

The requirement for a Community Engagement Statement and Design Review Panel should be in the supporting text rather than the policy.
(Bloor Homes South West, Diverse Partnerships Yatton Ltd, Various Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group)

There should be no binding requirement on applicants to be referred to a design review panel. It should remain at their own discretion, based on the circumstances of the case.
(Strongvox, Taylor Wimpey, Stephanie Fowler)

The justifications states that proposals should demonstrate how they have maximised opportunities for physical activity and recreation. This is unrealistic for all development proposals and inconsistent with the policy text which simply seeks to enable healthy lifestyles. This reference in the justification text should be deleted.
(Mead Realisations Ltd)



SP5: Towns

Policy SP5: Towns	
Number of representations received: 35	
Number of objections based on policy being unsound: 22	
Not positively prepared: 17 Not justified: 20 Not effective: 20 Not consistent with national policy: 18	
Number of objections based on policy being not legally compliant: 4	
Number of objections based on policy being not compliant with Duty to Co-operate: 10	
Main Issues Raised:	**North Somerset Council Officer Response:**
The wording of this policy means that development on the edge of the urban areas, where sustainable / supported under the presumption in favour of sustainable development, would not be appropriate. This policy should include flexibility to allow development adjacent to the settlement boundary subject to meeting certain criteria. **(Bellway Homes, Latimer Developments Limited, Mead Realisations, Miller Homes, Miller Homes, Wall Holdings Ltd)**	The plan has included a comprehensive review of settlement boundaries and has included proposed allocations within the settlement boundaries of towns. As the plan meets its identified housing requirement there is no longer the need for a policy approach which allows sites to come forward adjacent to settlement boundaries.
There are inconsistencies in the proposed policy and draft housing allocations which allocates a large level of housing growth at villages. It seems that villages have been considered areas appropriate for higher or equal levels of growth to defined Towns e.g. Pill and Easton-in-Gordano and Backwell. **(Bloor Homes, Maureen Butterly).**	The housing allocations have been determined in accordance with the plans spatial strategy which includes locations which have the ability to be well served by public transport such as Backwell which is located on a main bus route to Bristol and Weston and has a railway station, and Pill and Easton-in-Gordano which is due to have a new rail link to Bristol and Portishead. The policy will then guide development over the next 15 years and supports development within the four main towns.
There is no mention or link to DP9 or SP2. **(Environment Agency)**	The plan should be read as a whole and there is no need to repeat the policy requirements in DP9 and SP2 in every policy.



Enabling windfall policies and additional sites will be required to meet Bristol's unmet need. **(Home Builders Federation)**	As the plan meets its identified housing requirement and as such there is no need for additional allocations or further enabling windfall policies. Bristol's unmet need will be addressed through the emerging Spatial Development Strategy for the West of England.
Concern that new housing at towns wouldn't help with revitalisation as there won't be the necessary infrastructure to support it. This concern is particularly raised for Nailsea where it is felt the new proposed housing is too far from the town centre so new residents won't go into the town centre and support businesses there. **(Jeanne Craske, Maureen Butterly, Nailsea Action Group)**	An Infrastructure Delivery Plan accompanies the Local Plan and this document sets out infrastructure required the support the proposed growth including social, transport and community infrastructure.
The proposed settlement strategy does not reflect the existing settlement hierarchy as evidenced by the Council's own work. In order to be considered sound, a third tier should be added which should consist of the more sustainable villages, as evidenced by the Council's own work to assess the sustainability of villages. **(Latimer Developments Limited)**	The plan has included a comprehensive review of settlement boundaries and has included proposed allocations within the settlement boundaries of towns and larger villages. As the plan meets its identified housing requirement there is no longer the need for a multi-tiered approach to the settlement hierarchy as the required amount of growth has been met through allocations and a modest windfall allowance that is capable of being delivered within settlement boundaries.
Policy should promote the delivery of new housing by expressing that a mixture of homes both in type and tenure will be supported. **(Marcus Plaw, Persimmon, Mead Realisations)**	Policy DP46: Housing type and mix requires new development to provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location.
If adopted, it is recommended that this policy carries a presumption that settlement boundaries shall be frequently and routinely reviewed to ensure alignment development commitments and other changes 'on the ground' to ensure they remain up to date. **(Stephanie Fowler, Strongvox Ltd, Taylor Wimpey - Youngwood Lane, Nailsea)**	Settlement boundaries are reviewed as part of the Local Plan process. It is not feasible or desirable to be constantly reviewing settlement boundaries.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support for SP5: Towns which focuses development at the most sustainable locations. **(Aston and Co., Autograph Homes, R Storrar, Phoenix Life Ltd (Fraser Green), Stephanie Fowler, Strongvox Ltd, Taylor Wimpey (Youngwood Lane, Nailsea)**	Support welcomed and noted.



We support housing at the main towns including Portishead. If the new train station comes into operation **(Kath Scargill)**	Support welcomed and noted. The station is scheduled to open by 2028.
The ICB strongly supports the Policy SP5's recognition of the need for new developments within the settlement boundaries of Weston-Super-Mare, Clevedon, Nailsea and Portishead to be (our emphasis added) "successfully served by infrastructure such as transport, education and health facilities". We therefore consider this policy to be sound on the grounds that health infrastructure requirements have been proactively considered **(NHS ICB)**.	Support welcomed and noted.
In line with the spatial strategy, National Highways note that Policy SP5 promotes development in towns given their range of services, facilities and jobs, and accessibility by sustainable transport modes. Policy SP6 seeks to restrict new development in less sustainable locations outside settlement boundaries. This is supported due to the likelihood that development in such locations would encourage car use. **(National Highways)**	Support welcomed and noted.
Suggested modifications:	
The policy wording should be amended to provide clarity: "Proposals for new development within, ***or adjacent to***, the settlement boundaries of the four towns of Weston-super-Mare, Clevedon, Nailsea and Portishead ***(including the strategic allocations)*** as defined on the Policies Map will be supported provided that they: […]" **(Bellway Homes)** Without the following modifications, SP5 cannot be considered justified, effective, or consistent with national policy: • Directs more growth to the four towns • maximises brownfield and higher-density urban development • avoids disproportionate growth in less sustainable rural locations • strengthens regeneration and low-carbon living in town centres, and • ensures infrastructure is deliverable and aligned with urban growth.	



(Maureen Butterly)

Proposals for new development within ***or adjoining*** the settlement boundaries of Weston- super-Mare, Clevedon, Nailsea and Portishead ~~as defined on the Policies Map~~ will be supported provided that they:…

Add following sentence to the end: ***Sites outside the settlement boundaries in excess of about 75 dwellings at Weston-super-Mare or 50 dwellings at the other towns must be brought forward as allocations through Local Plans or Neighbourhood Plans.***
(Mead Realisations Ltd)

Amend the wording of Policy SP5 to support proposals for new development 'at' Weston-super-Mare (including the Weston Villages), Clevedon, Nailsea and Portishead, and to delete the words 'within the settlement boundaries of'
(Miller Homes, Wall Holdings)

SP6: Villages and rural areas

Policy SP6: Villages and rural areas	
Number of representations received: 47	
Number of objections based on policy being unsound: 30	
Not positively prepared: 25 Not justified: 27 Not effective: 28 Not consistent with national policy: 24	
Number of objections based on policy being not legally compliant: 5	
Number of objections based on policy being not compliant with Duty to Co-operate: 12	
Main Issues Raised:	**North Somerset Council Officer Response:**
The proposed allocations at Congresbury are not in accordance with policy SP6 as no supporting infrastructure is proposed and the quantum of development is disproportionate to the size of the village. **(Adrain Mealing)**	Congresbury is one of the more sustainable villages in the North Somerset and is identified as a Category A village in the Spatial Strategy Site Selection Capacity Paper which forms part of the evidence base. This means it is considered to be relatively sustainable in its own right with a range of easily accessible services and facilities and good public transport links to towns. Three sites equating to 183 homes are proposed in Congresbury, two of which have planning consent. This is not considered to be disproportionate to a village the size of Congresbury.
BPC object to the proposed amendments to the settlement boundary of Backwell, which are vastly extended to include the strategic allocations of Grove Farm and Land East of Backwell, but which also incorporate other undeveloped land which lies between those allocations and the existing built-up areas of the village. **(Backwell Parish Council, Nailsea Town Council, Flax Bourton Parish Council, Brockley Parish Council, Backwell Residents Association, Nailsea Action Group)**	It would not be possible to draw the settlement boundary around the proposed allocation and not include the incidental land between the proposed allocation and the existing built form of the settlement. This land however, mainly comprises of a recreation ground, primary school, and secondary school playing fields and a park which are protected under other policies in the plan.
There are inconsistencies in the proposed policies (SP3, SP5 and SP6) and draft housing allocations. It seems that villages have been considered areas appropriate for higher or equal levels of growth to	SP3 states that *'Beyond the strategic development areas the amount of development at villages and in the countryside will relate to local community needs'*. This approach is reflected in the site allocations at the

defined Towns, for example 1,683 homes are allocated at Backwell and 1,100 at Pill (villages), but 1,347 homes are allocated at Portishead (a town). **(Bloor Homes - North of Pound Lane Nailsea site, Bloor Homes South West, Jeanne Craske, Persimmon Homes, Maureen Butterly, Miles Estate)**	villages (which are not part of strategic growth locations such as Backwell and Pill and Easton-in-Gordano) with just 12% of the housing supply being met in villages and rural areas that do not form part of a strategic location.
The entirety of the promoted land (HE20124) at Black Rock, should be removed from the Green Belt rather than just the eastern parcel, as this represents an opportunity to strengthen delivery at the town in accordance with the Council's strategy, and this should be prioritised ahead of growth at lower order settlements. **(Bloor Homes South-West)**	At the time of plan preparation, we were informed by the site promoters that the western parcel of land at Black Rock would be used for biodiversity mitigation and not built development. As such it was not allocated or removed from the Green Belt and the settlement boundary for Portishead was not extended around this parcel of land.
Agree with policy, but there is no mention or link to DP9 or SP2. **(Environment Agency)**	The plan should be read as a whole and there is no need to repeat or cross reference to policies.
Objections to the approach to SP6 stating that it is too restrictive and that not allowing housing sites to come forward adjacent to settlement boundaries (as permitted under the current local plan policies) reduces flexibility in the housing land supply (which is overly reliant on strategic locations) and prevents growth at the more sustainable settlements and could stop villages from thriving. **(Chestnut Property Developments Ltd - Chestnut Farm, Yatton, Diverse Partnerships Yatton Ltd, Harrow Estates, HBF, Latimer Developments Limited, Lichfields – Bristol, LiveWest, Persimmon Homes, Mead Realisations Ltd, Stephanie Fowler, Strongvox Ltd, Taylor Wimpey (Youngwood Lane, Nailsea, The Newcombe Estates Company Limited, Verto Homes), Woodstock Homes Ltd, Oxford Plasma, Yatton)**	The plan has included a comprehensive review of settlement boundaries and has included proposed allocations within the settlement boundaries of towns and villages. As the plan meets its identified housing requirement there is no longer the need for a policy approach which allows sites to come forward adjacent to settlement boundaries.
Yatton/Claverham should have been a focus for growth due to being a sustainable location as set out in the 'Consultation paper on additional sites for the Regulation 19 plan' (February 2025), identifying Yatton/Claverham as a 'larger, most sustainable village'. However, no new allocations are proposed here. **(Latimer Developments Limited, Persimmon)**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such no additional sites at Yatton or Claverham have been required.



Villages such as Wrington are unsuitable for housing development because there is little employment and almost no public transport to stations and bus stops for commuters to Weston or Bristol. **(Chris Segar, Helena Markovic-Buck, Nancy Wedin, R Storrar)**	Comment noted. No housing allocations are proposed at Wrington.
Wrington should be a focus for more housing development given its sustainability credentials as set out in the council's own evidence. No new allocations are proposed here which will place services and facilities at significant risk, fail to address growing affordability issues and increase unmet need to the great detriment of the local community. **(Lichfield's – Bristol, LiveWest, Woodstock Homes - Land west of Butts Batch, Wrington)**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such no sites at Wrington have been required.
Land outside the established village settlement boundaries should not be included in the proposed development allocation. Allocations at Pill and Easton-in-Gordano are contrary to SP6 which states residential development outside settlement boundaries will be restricted to "replacement dwellings, residential conversion of rural buildings, or redevelopment of previously developed land". Extending development beyond these boundaries undermines planning principles and sets a dangerous precedent for further expansion. **(E Beacon, Justin Saunders)**	The adopted settlement boundaries have been reviewed as part of the local plan process and as such have been re-drawn to incorporate new allocations. Policy SP6 relates to the proposed new settlement boundaries – not the existing ones.
Objection to the Categorisation of the village of Failand as at 'Category C' village in the spatial strategy site selection process as it is considered to be a more sustainable due to its connectivity/proximity to Bristol and sustainable in its own right. **(Harrow Estates,)**	Failand has very limited services and facilities and poor public transport links connecting it to higher order settlements. Therefore, it is considered appropriate to identify it as a Category C village.
Portbury should be considered a sustainable settlement and an appropriate location for proportionate growth within the spatial strategy. **(Richard Little)**	Portbury has limited services and facilities but it close to the higher order settlements of Portishead and Pill and Easton-in-Gordano. Therefore, it is considered appropriate to identify it as a Category B village. Other more suitable sites have been selected to meet the Local Plan housing requirement and as such no sites at Portbury have been identified.
Objection to two speculative applications at Claverham which are not	These planning applications will be determined under the current policy



allocations in the Local Plan. **(Helen Lewis and Will Lewis)**	framework.
Additional allocations and enabling windfall policies are needed to ensure sufficient supply. **(Home Builders Federation)**	As the plan meets its identified housing requirement there is no need for additional allocations or enabling windfall policies.
The spatial strategy of the Plan should recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village. Similarly, the Local Plan should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas. The current range of village services should not be used as a basis for only locating development close to existing services, it could in fact also identify where services could be improved through new development. Allocating housing sites in rural areas can also provide opportunities for small sites which are particularly helpful for SME builders. **(Home Builders Federation).**	The categorisation of villages undertaken in the Spatial Strategy Site Selection Capacity Paper does recognise the clustering of villages and the functional relationship between smaller villages and higher order settlements particularly where there are sustainable transport links to nearby higher order settlements with a range of services and facilities. In order to make existing less sustainable settlements more sustainable a significant quantum of growth is often required, potentially in locations which do not have good access to public transport links or even the potential to be well served by public transport. This would increase car use and is contrary to the plan's spatial strategy. The plan allocates a range of sites of different sizes and typologies.
To be effective the policy should also include a list of villages, in the same way the four towns are listed in Policy SP5. Plan users should not have to consult the policy map to see which locations are villages. **(Home Builders Federation, Waddeton Park Ltd - Land south of Greenhill Road)**	As stated in the policy text, the villages to which this policy applies are listed in Schedule 5.
Policy has created a two-tier settlement strategy that does not reflect that the form, nature, size and sustainability credentials of Villages within the authority varies considerably with all settlements apart from Weston -Super-Mare, Nailsea, Clevedon and Portishead (as well as the strategic development locations) considered in the 'Villages and rural areas' category.	As the plan meets its identified housing requirement and proposed allocations are incorporated within the reviewed settlement boundaries there is no longer the need for a policy approach which identifies a multi-layered settlement hierarchy to guide speculative growth.



(Latimer Developments Limited, LiveWest, Verto Homes, Woodstock Homes Ltd (Oxford Plasma, Yatton)	
Policy states that outside of settlement boundaries new development will be restricted (referring to examples). This is not consistent with the Policy SP3 which speaks of residential development at risk of flooding will be minimised, not resisted or restricted. These policies lack clarity and should be amended reflecting opportunities for residential development in locations where potential impacts, such as risk of flooding, can be addressed through interventions. **(Persimmon Homes)**	Policy SP3 is the overarching spatial strategy, which is clear that outside the towns development at risk of flooding is to be minimised. Policy SP6 sets out what types of development will be acceptable in the countryside outside settlement boundaries. This is separate to whether it is located in an area at risk of flooding. This is dealt with in Policy DP9: Flood Risk
The Council has provided no explanation for the exclusion of sites at Category A and B villages such as Land east of Portbury and Land east of Long Ashton. During Regulation 18, villages were categorised from Category A (most sustainable) to Category D (least sustainable). In Spring 2025, this classification was abandoned, and previously sustainable villages were downgraded to “less sustainable” without any published evidence or justification Reasonable alternatives have not been properly assessed. **(Newcombe Estates Company Ltd)**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such no sites at Portbury or Long Ashton have been required. The categorisation of settlements for the purpose of site selection has not been abandoned and is set out in the Spatial Strategy Site Selection Capacity Paper. Reasonable alternatives have been assessed through the Sustainability Appraisal.
Policy SP6 has a reference to development being supported where it contributes to local distinctiveness. This is supported but needs strengthening. Policy SP6 should include reference to “the local historical building appearance, style and vernacular”. **(Tony Harden)**	Policy DP1: High quality design sets out further detail on design of new developments.
Support/Other Comments:	**North Somerset Council Officer Response:**
Although it is disappointing that so many houses are required by Central Government to be built in our area, I am pleased that much of the feedback in relation to proposals for Long Ashton given at the previous consultation stage has been taken into account. **(B Northover)**	Comment noted.
BPC strongly support the categorisation of Backwell as a Village under Policy SP6 and broadly support the wording of Policy SP6 to	Comments and support noted.

limit new development to land within the settlement boundary, subject to compliance with all policy criteria. **(Backwell PC, Nailsea TC, Flax Bourton PC, Brockley PC, Backwell RA, Nailsea Action Group)**	
We support this Policy and especially note that 'Rural buildings which have an existing permission to be converted to residential use will not be granted permission to be rebuilt and replaced to create a new build dwelling.' We feel this will importantly help to retain the character and history of the local area**.** **(Wrington Parish Council)**	Comments noted and support welcomed.
Suggested modifications:	
Policy SP6 should be amended to make it clear that sustainable housing developments adjacent to the settlement boundary of villages are acceptable subject to criteria **(Latimer Developments Ltd, LiveWest, Mead Realisations Ltd)** The settlement hierarchy should be amended to give status to the more sustainable settlements **(Latimer Developments Ltd, LiveWest)** Policy SP6 should be redrafted to be consist with the Council's evidence to acknowledge that development at sustainable settlements is supported. Flexibility should be added for sustainable sites to come forward outside of settlement boundaries for service villages subject to criteria. **(Lichfields – Bristol)** Wrington should be identified as a more sustainable settlement and its relevance to Policy SP6 (and the opportunity for additional release of sustainable sites) clarified. **(LiveWest)** New development within **or adjoining** the settlement boundaries of villages ~~as defined on the Policies Map~~ will be supported where: o It results in a form, design and scale of development which is high quality, respects and enhances the local character, contributes to placemaking and the reinforcement of local distinctiveness, and can be readily assimilated into the village; o ~~The size, type, tenure and range of housing reflects local community needs;~~ o It will not cause significant adverse impacts on local services and infrastructure, including cumulative impacts;	

- The location of development supports ~~maximises~~ opportunities to reduce the need to travel and connects to local facilities by high quality walking and cycling infrastructure, with good public transport connections for longer trips; and
- The uses complement the defined local centres and contribute to their vitality and viability.

Sites outside the settlement boundaries of Backwell, Banwell, Churchill, Congresbury, Easton in Gordano/Pill, Long Ashton, Winscombe, Wrington and Yatton in excess of 25 dwellings must be brought forward as allocations through Local Plans or Neighbourhood Plans.
(Mead Realisations Ltd)

Policy SP6 should include reference to "the local historical building appearance, style and vernacular".
(Tony Harden)

SP6 should be amended, to introduce a settlement hierarchy differentiating between well-serviced settlements and smaller villages / rural areas and if only to read, "…. Outside settlement boundaries new residential development will be **permitted, if there is a demonstrable need and in accordance with the settlement hierarchy. In other circumstances, residential development** will be restricted…."
(Verto Homes)



SP7: Green Belt

Policy SP7 Green Belt	
Number of representations received: 134	
Number of objections based on policy being unsound: 92	
Not positively prepared: 49 Not justified: 82 Not effective: 68 Not consistent with national policy: 65	
Number of objections based on policy being not legally compliant: 43	
Number of objections based on policy being not compliant with Duty to Co-operate: 38	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that 50% affordable housing or other 'Golden Rules' will not be delivered on Green Belt sites **(A Bryant, Matt Burley).**	The requirement to meet the 'Golden Rules' on sites released from land in the Green Belt is enshrined in national policy and clearly set out in policy SP7: Green Belt, and in DP43: Affordable housing.
Concern over loss of countryside and impact on biodiversity, landscapes, wildlife and the natural environment due to Green Belt allocations. **(A Bryant, Avon Wildlife Trust, C Wheeler)**	This concern is recognised and the Local Plan puts significant measures in place to mitigate against the impacts of development on ecology.
The Black Rock allocation at Portishead only includes half the land (eastern site) being promoted for development and should include the whole site (East and western sites), particularly as they are both grey belt. **(Aston and Co., Bloor Homes South West).**	At the time of plan preparation, we were informed by the site promoters that the western parcel of land at Black Rock would be used for biodiversity mitigation and not built development. As such it was not allocated or removed from the Green Belt and the settlement boundary for Portishead was not extended around this parcel of land.
Objection to the proposed removal of Green Belt around Nailsea and Backwell, in particular the identification of land East of Backwell as grey belt in the accompanying Green Belt Background Paper (2025). It is not a sustainable location and therefore contrary to paragraph 110 and 115 of the NPPF. **(Backwell PC, Nailsea TC, Flax Bourton PC, Brockley PC, Backwell RA Nailsea Action Group, T Crane, K Riches, Jeanne**	Due to the increase in North Somerset's housing requirement through the introduction of the mandatory standard method in the NPPF (Dec 2024) North Somerset cannot sustainably meet its housing requirement on sites outside the Green Belt. This constitutes exceptional circumstances and, in such instances, the NPPF directs local authorities to review their Green Belt boundaries and propose alterations to meet their housing need in full. As such we have undertaken a two stage Green Belt review and released

Craske, Kate Wickens).	land from the Green Belt for housing allocations, in relatively more sustainable locations.
Objection to Land North of Nailsea being removed from the Green Belt. **(Chris Ambrose, Doug Willis, A Bryant, T Crane, Wraxall and Failand Parish Council)**	Due to the increase in North Somerset's housing requirement through the introduction of the mandatory standard method in the NPPF (Dec 2024) North Somerset cannot sustainably meet its housing requirement on sites outside the Green Belt. This constitutes exceptional circumstances and, in such instances, the NPPF directs local authorities to review their Green Belt boundaries and propose alterations to meet their housing need in full. As such North Somerset have undertaken a two stage Green Belt review and released land from the Green Belt for housing allocations, in relatively more sustainable locations.
Objection to the requirement for 50% affordable housing on land released from the Green Belt due to viability concerns which are highlighted in the council's own viability assessment which tests various levels up to 40% on greenfield sites but not 50%. Given the plan now includes for 30%, on greenfield sites elsewhere, it suggests 40% was found to not be a viable option, let alone 50% provision. Furthermore, construction costs have increased, whilst market values have not risen. **(Barratt Bristol, Bloor Homes - North of Pound Lane Nailsea site, Rubix Strategic Land, Taylor Wimpey - Woodspring)**	DP43 allows case by case considerations, with the inclusion of the following wording: Developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7, and other Green Belt sites, 30% on greenfield sites and 20% on previously developed land, all at nil public subsidy. If these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored. The viability evidence supports this approach, explaining: *there may be opportunities to secure enhanced affordable housing delivery which would be missed if the target percentage(s) were set too low. For example, there may be circumstances including sites or locations supporting increased viability and which may secure permission later in the plan period, or localised opportunities even within areas otherwise indicated as having lower viability more typically. Therefore the Council should not rule out higher proportions of affordable housing being secured in individual cases. If a higher policy percentage is set than broadly indicated through the results of this and previous viability work, then our recommendation would be for that to continue to include an*

	acknowledgment of the role of viability and potential flexible approach within policy.
Policy SP7 should also be amended to refer to 175 dwellings rather than 160 dwellings for Land at Lodway Farm, Pill and Easton-in-Gordano. **(Barretts Bristol)**	Comment noted. The capacities identified in the plan are clearly marked as indicative, and may be refined as detailed planning applications are considered.
Green Belt releases of greatest relevance to B&NES are land at Woodspring, south west of Bristol (situated directly adjacent to the boundary with Bristol to the east and north west to the boundary with B&NES, and land at Colliter's Way (situated directly adjacent to the boundary with Bristol to the east and north west to the boundary of B&NES. Given the Green Belt review and proposed changes to the Green Belt in the areas identified above B&NES would welcome ongoing dialogue and engagement on the approach to the Green Belt to ensure, as necessary, consistency of approach with work in the WECA area and through the B&NES Local Plan 2025-2043. **(Bath and North East Somerset Council)**	Comment noted and North Somerset Council will continue ongoing dialogue and collaborative working with B&NEs with regard to cross border issues and the wider WECA area.
Objection to removing land from the Green Belt for the housing allocation at Black Rock and Tower Farm, Portishead due to loss of countryside, the impact on Weston Big Wood SSSI and traffic impacts. **(C Jones, Paul Gardner, Toby Thurlow, David J Patterson, H Moody, Helen Adams, Jane Mather, John McGrath, Lindsey Churchill, Louise Fletcher, Mr Greg Aston, Penelope Riley, Portishead Town Council)**	Due to the increase in North Somerset's housing requirement through the introduction of the mandatory standard method in the NPPF (Dec 2024) North Somerset cannot sustainably meet its housing requirement on sites outside the Green Belt. This constitutes exceptional circumstances and, in such instances, the NPPF directs local authorities to review their Green Belt boundaries and propose alterations to meet their housing need in full. As such North Somerset have undertaken a two stage Green Belt review and released land from the Green Belt for housing allocations, at sustainable locations. Comments on these particular sites are also responded to in detail under schedule 1 representations.
Objection to the inclusion of housing figures in SP7 as they can result in confusion for a decision-maker. Policy SP7 includes, where applicable, dwelling numbers based on 'indicative' capacities and presents these as definitive, whereas Policy LP5 and associated Schedule 1 are the relevant policies to ascertain and guide decision-making on capacities. The inclusion of figures within Policy SP7 as a	SP7 also refers to the Policies Map which relates to the allocations as set on in LP5 and Schedule 1. The plan should be read as a whole. It is considered helpful to have the inclusion of housing figures in SP7 to provide a guide to the scale of the sites.



result can obscure expected delivery of homes and conflict with Policy LP5 and Schedule 1. **(Catesby Estates)**	
Support for the intention of the Council within Policy SP7 to explore opportunities to enhance the beneficial use of Green Belt, however, the policy wording lacks detail for what the Council envisions, and no further detail is provided within explanatory text. Moreover, it is not apparent from the evidence base that any such measures have been taken into account to date. **(Catesby Estates)**	The justification sets out that development will be expected to *"compensate for the loss of the 'green resource' by introducing innovative design for green spaces, wildlife habitats, street trees and sustainable drainage solutions as well as improve the accessibility and environmental quality of the remaining Green Belt*".
Query whether proposals at Bristol Airport require a further release of land from the Green Belt to accommodate the operational requirements of the expansion to 15 mppa. **(Burrington Parish Council)**	The Local Plan does not propose to release land from the Green Belt to accommodate the airport's aspiration for expansion to 15mppa.
The minimum number of new dwellings that the council is required to plan for over the plan period is 23,700, however the plan proposes 24,495. This is in excess of the level identified by the Government. The approach to the proposed removal of the sites from the Green Belt is not fully justified as it has not fully considered all reasonable alternatives particularly with regard to sites which are less environmentally sensitive. The relatively late designation of some of this land has not been properly considered by the NSC Green Belt assessment and therefore Policy SP7. Suggestions for alternative sites to Tower Farm and Black Rock sites: • Wyndham Way – utilise land better • Land South of Clevedon Road • Wyndham Way and Cheviot Meadow (17/P/1229/FUL) – permission for 33 homes • Land is also for sale next to The Poacher public house, with an indicative 8 homes. • Increase density at Castlewood, Clevedon **(Portishead Town Council)**	The sites suggested would not have the capacity to deliver the number of homes required to replace the proposed sites allocated at Portishead which are in the Green Belt. It is also a reasonable approach to ensure a small margin over and above the minimum housing requirement.



Amend SP7 to explicitly protect Pill-Dock Green Belt corridors as strategic gaps to prevent merger/coalescence (per NPPF para 143(b)), deleting LP4 sites HE206/HE20491. Require full alternatives appraisal before any release. Keep the Green Belt boundary exactly as it is now, or at the very least only allow removal if a proper, published Green Belt review proves exceptional circumstances and shows the land is genuine low-value "grey belt". Add wording to SP7 that says: "Green Belt release will only happen after all reasonable non-Green Belt alternatives have been exhausted and a full exceptional-circumstances report has been published and consulted on." These changes would bring the policy back into line with national rules and stop our high-quality countryside being lost without proper justification. **(Pill and Easton-in-Gordano Parish Council)**	The Green Belt Background Paper which forms part of the evidence base of the Local Plan sets out the exceptional circumstance for releasing land from the Green Belt. The two Green Belt assessments, which also form part of the Local Plan evidence base, identify potential grey belt land. stage 1 – assessment of green belt land in North Somerset stage 2 green belt assessment - October 2025
Queries around the Stage 1 Green Belt Assessment methodology as it relies on professional judgement and produces subjective outcomes and are not independent or impartial **(Chris Ambrose)**	The Stage 1 Green Belt assessment has been produced by experienced consultants with the methodology based on government guidance regarding assessment of the Green Belt.
Support for the removal of Land at Tower Farm from the Green Belt and allocation to meet the housing land shortfall. Concern however is raised regarding the affordable housing requirement for the site, and the approach to primary school contributions. Requested change to the allocation boundary to remove a small additional parcel of land from the Green Belt and include that as part of the housing allocation. **(Parker Strategic Land)**	Support welcomed. DP43 allows for case-by-case considerations in terms of affordable housing, with the inclusion of the following wording: *"Developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7, and other Green Belt sites, 30% on greenfield sites and 20% on previously developed land, all at nil public subsidy. If these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored".* It is felt that the housing capacity identified for this site can be delivered without this additional parcel. Therefore it is not proposed to remove it from the Green Belt or include it as part of the allocation.
Disagree that Exceptional Circumstances exist to release land from	The Green Belt Background Paper which forms part of the evidence base

the Green Belt as: • Brownfield sites should have be better utilised. • Increase densities at other allocations • Worked with neighbouring authorities to accommodate housing needs • Consider more non-Green Belt land in the south and south west of the district. **(David J Patterson, E Beacon, Doug Willis, H Moody, H Pirouet, John McGrath, Kevin Payne, Lucy Byrne, Matt Lansdkwn, Maureen Butterly, Mike Bevens, Nailsea Action Group, Paul Segar, P Sterndale, Penelope Riley, Portishead Town Council, Sustainable Pill & District, T Crane, Wain Homes, Wall Holdings Ltd)**	of the Local Plan sets out the exceptional circumstance for releasing land from the Green Belt. Points on brownfield land and urban capacity are further addressed in the Spatial Strategy, Site Selection and Capacity paper.
Footnote 7 has not been taken into account in identifying grey belt at Pill and Easton-in-Gordano as all sites are in the North Somerset and Mendips Bat SAC, Lodway Farm and Pill Green are in areas at risk of flooding, there is Ancient Woodland along Markham Brook, Lodway Farm is adjacent to the Severn Esturay SAC/Ramsar/SSSI. **(Sustainable Pill and District)**	Footnote 7 constraints have been addressed in both Green Belt Assessments: stage 1 – assessment of green belt land in North Somerset stage 2 green belt assessment - October 2025
Housing requirement is too high resulting in the release of Green Belt land. The plan should not meet the government's target and then Green Belt land won't need to be built on. We do need housing but for those who can't afford it. Not more expensive homes for the middle classes which is what will be built in the Green Belt. **(Mr D Wheeler)**	Policy DP43 and SP7 require 50 % affordable housing on sites released from the Green Belt in line with the 'Golden Rules' set out in the NPPF. Policy DP46 requires developments to deliver a range of housing types stating that developments of 10 or more dwellings should make provision for *"A proportionate and appropriate mix of types and sizes of homes to address local needs and meet the requirements of the population across all stages of their lives. This includes bungalows, smaller properties suitable for downsizing or first time buyers, retirement accommodation and accessible homes."*
Refence to certain sites being considered to be grey belt would be appropriate in this policy, and the potential capacity from the North Nailsea site should be revisited and be amended to 429 dwellings. **(Nailsea Holdings LVA LLP)**	Grey belt assessment is set out in the evidence base in the two Green Belt Assessments published alongside the Local Plan. stage 1 – assessment of green belt land in North Somerset



	stage 2 green belt assessment - October 2025 Capacities identified in the plan are clearly marked as indicative, and subject to refinement through detailed planning applications.
Promotion of non-Green Belt sites to identify reasonable alternatives to meeting the councils housing requirement outside of the Green Belt. These include: • Land north of High Street, Claverham **(Latimer Developments Limited)** • Land at Cox's Green, Wrington **(Highgrove Strategic Land)**	Noted. These omission sites are identified in the summary template for LP5: Housing and employment allocations.
Objection to the release of sites from the Green Belt at Pill and Easton-in-Gordano as no Green Belt review has been undertaken and exceptional circumstances haven't been demonstrated. **(E Beacon, Easton-in-Gordano Parish Council, Justin Saunders, Kevin Payne, Kieran Argo, Lucy Byrne, Matt Burley, Peter Kirsen, Pill & Easton-in-Gordano Parish Council, Rob Harvey, Sustainable Pill & District)**	The Green Belt Background Paper which forms part of the evidence base of the Local Plan sets out the exceptional circumstance for releasing land from the Green Belt. The two Green Belt assessments have been undertaken which form part of the Local Plan evidence base. stage 1 – assessment of green belt land in North Somerset stage 2 green belt assessment - October 2025
Objection to land at Bristol Airport being released from the Green Belt. **(Cleeve PC, Colin Knowles, Nancy Wedin, Nempnett Thrubwell Parish Council)**	The release of land at Bristol Airport reflects the operational area that relates to the planning consent that is in place to increase capacity to 12mppa. No further release is proposed in this plan.
Grey belt isn't mentioned enough in the Local Plan policies. **(Hill Residential Ltd)**	The identification of potential grey belt forms part of the evidence base to the Local Plan and does not need to be mentioned in the strategic policy.
Objection to the proposed extension to the Green Belt at Nailsea and Backwell which would alter the approach to Green Belt designation in this area only (between Nailsea and Backwell), introducing an irregularity with an entirely different purpose, well removed from checking the unrestricted sprawl of Bristol and would frustrate sustainable housing development. **(Gleeson Land, Stephanie Fowler, Taylor Wimpey (Land at Grove Farm and Burnt House Farm, Backwell, Taylor Wimpey**	Exceptional circumstances exist to establish an extension to the Green Belt at Nailsea and Backwell. The exceptional circumstances include the scale of proposed development at Nailsea and Backwell which risks the merger of settlements, the need to secure the longer-term planning for the area and preserve openness, and the need for a stronger more permanent designation than the strategic gap to properly protect the openness of the area.



(Youngwood Lane, Nailsea)	
Remove reference to Land at Woodspring, Pill / Easton-in-Gordano and Land at Nailsea / Backwell from the list of land to be released from the Green Belt. **(Miller Homes)**	These are proposed allocation in the Green Belt and therefore should be listed in SP7.
HBF believe that in light of the housing requirement of North Somerset needing to be higher, a full Green Belt review is required along with the further Green Belt releases. HBF believe the exceptional circumstances of the housing crisis and the need to fully meet the housing needs of the area justify additional Green Belt releases and further housing allocations. HBF request that this policy is amended to include additional sites for housing. **(Home Builders Federation)**	The two Green Belt assessments have been undertaken which form part of the Local Plan evidence base. stage 1 – assessment of green belt land in North Somerset stage 2 green belt assessment - October 2025 The Local Plan has released sufficient land from the Green Belt to meet its housing requirement.
Concern over the areas identified as 'potential for grey belt' in the Strategic Green Belt Assessment' particularly around Long Ashton **(Long Ashton Nature Conservation and Environment Trust, Long Ashton Parish Council)**	If land is identified as potential grey belt this does not mean it should automatically be released from the Green Belt. Land should only be released from the Green Belt if there are exceptional circumstances to justify that release.
Green Belt should be protected for farming and food security. **(JF Slade, Fran Slade, Jeremy Blatchford, Jo Halfpenny, M Slade, Rob Harvey, S Roberts)**	In plan-making the identification of BMV for housing development is weighed up in the planning balance when selecting suitable sites. However, emerging Policy DP53: Best and Most Versatile Agricultural Land provides a level of protection to agricultural land.
The proposed changes to the Green Belt at Pill and Easton-in-Gordano are inconsistent because there is no substantive difference between the gardens of numbers 38, 36 and 34 Ham Green and the garden to number 40 Ham Green. Therefore, the proposed changes have failed to remove this anomaly. **(Jerry Evans)**	This point has been picked up and addressed in LP7/Schedule 5.
Exceptional circumstances have not been demonstrated to justify the release of land from the Green Belt, and in particular the sites that it is proposed to allocate for housing development at Woodspring (South West of Bristol) and Pill / Easton-in-Gordano, which should only be released to meet unmet needs arising from Bristol City Council, and those at Nailsea / Backwell, where reasonable	The Green Belt Background Paper which forms part of the evidence base of the Local Plan sets out the exceptional circumstance for releasing land from the Green Belt. It is accepted that Bristol City Council has identified unmet need, however their Local Plan remains in its examination phase and the quantum of



alternative non- Green Belt sites are available that should be afforded priority in accordance with the spatial strategy and the sequential approach to site selection by which it is underpinned. Changes Sought Policy SP7 - Remove reference to Land at Woodspring, Pill / Easton-in- Gordano and Land at Nailsea / Backwell from the list of land to be released from the Green Belt. **(Tom Rocke)**	unmet need has not yet been confirmed, nor has any work been undertaken with neighbouring authorities to look at how this should or could be apportioned. North Somerset Council is committed to working with the West of England authorities to produce a Spatial Development Strategy, as directed by the government. This is the appropriate mechanism to address the needs of the sub region as a whole.
The Council must be able to demonstrate that the Pre-submission Plan has allocated all suitable non-Green Belt sites that are sustainably located in accordance with the emerging Plans' spatial strategy. However, as discussed further in representations related to Schedule 1, Wain Homes site, referred to in the consultation as Stowey Road, Yatton (HE20800), has not been allocated despite being suitable and sustainably located in accordance with the spatial strategy. The site has been erroneously omitted from the plan on the basis of flood risk. However, evidence provided in support of these representations demonstrates that up to 130 homes can be delivered on areas of the site that are not at risk of flooding. **(Wain Homes)**	Due to the significant increase in the housing requirement for North Somerset following the release of the NPPF (2024) it is not possible to meet this need outside of the Green Belt. The strategic locations identified in the Green Belt accord with the spatial strategy and are the most sustainable solutions for delivering housing growth over the plan period. Omission sites are addressed in responses to Policy LP5.
Objection to the SP7 of the North Somerset Local Plan 2041, specifically the proposed allocation of the Woodspring (southwest of Bristol) site for 3,500 dwellings and the failure to allocate sufficient land elsewhere – specifically sites owned by Woodstock homes who have sites in Yatton, Sandford (HE201022) Banwell (HE2098) and Wrington (HE20198). **(Woodstock Homes)**	Due to the significant increase in the housing requirement for North Somerset following the release of the NPPF (2024) it is not possible to meet this need outside of the Green Belt. The strategic locations identified in the Green Belt accord with the spatial strategy and are the most sustainable solutions for delivering housing growth over the plan period.
Requests to remove land from the Green Belt	
Request to remove land from the Green Belt to the north-east of Colliters Way to facilitate the Epic development which has planning consent. Propose that the boundary is delineated by Colliters Way (A4174, Feeder Road and the Ashton Vale Trading Estate)	Land north of Colliters way does not have planning consent and it is not a proposed allocation. It has no planning status and as such there is no justification for removing it from the Green Belt.



(Epic Systems)	
Request to remove Land east of Failand from the Green Belt for housing development. **(Harrow Estates)**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such this site has not been allocated and therefore should not be removed from the Green Belt.
Request for Land at Castle Road, Clevedon to be removed from the Green Belt for housing development. **(Miles Estates)**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such this site has not been allocated and therefore should not be removed from the Green Belt.
Request to remove Land East of Wrington from the Green Belt for housing development and this site should have formed part of the Green Belt review. **(LiveWest)**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such this site has not been allocated and therefore should not be removed from the Green Belt.
Bristol Airport welcomes the release of land from the Green Belt to reflect the grant of planning permission for an increase in operational capacity up to 12 million passengers per annum (mppa) however requests that the Green Belt Inset is extended to reflect our adopted Master Plan land requirements to accommodate longer-term development up to 15mppa. The councils Stage 2 Green Belt Assessment does not assess land around the airport which is a significant omission and renders policy S7 unsound. **(Bristol Airport)**	The release of land from the Green Belt at Bristol Airport reflects the consented growth to 12 million passengers per annum. The airport's masterplan and planning application for further growth is recognised but does not have any formal planning status and as such it would not be appropriate for further Green Belt releases at the airport.
Request to remove Land to the West of Failand from the Green Belt for residential development. **(Hill Residential Ltd)**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such this site has not been allocated and therefore should not be removed from the Green Belt.
Request to remove land from the Green Belt south of Long Ashton, which is identified as grey belt, for housing development to accommodate Bristol's unmet housing need and allocate sites at Wyndhurst Farm and Stock Lane Farm at Churchill/Langford which are non-Green Belt sites and should be prioritised over Green Belt sites. **(University of Bristol)**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such this site has not been allocated and therefore should not be removed from the Green Belt.
That the policy be amended to include the following sites: - Land at East Portishead – 650 dwellings - Land north of Festival Way, Long Ashton – 20 dwellings Grey Belt should be referenced in the Policy.	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such this site has not been allocated and therefore should not be removed from the Green Belt.



Also, that there is a commentary provided in the plan relating to the delivery of development on the edges of settlements inset in the Green Belt. **(Persimmon)**	
BPC requests that Policy SP7 and the Policies Map are amended to release land within Shipway Farm from the Green Belt. The following wording should be added to Policy SP7: "Land at Royal Portbury Dock will be released from the Green Belt to meet the development needs of Bristol Port over the plan period." **(Bristol Port Company)**	Exceptional circumstances have not been adequately demonstrated to justify the release of land in the Green Belt at Royal Portbury Dock.
Other sites that do not contribute to the Green Belt objectives should be inset from the Green Belt. Without this amendment the Council may be unable to demonstrate a five-year housing land supply in the future. The Land at East and West of Flax Bourton would provide this flexibility and has an indicative capacity of 200-250 dwellings. **(MacMic Strategic Land)**	Only proposed allocations are removed from the Green Belt due to the exceptional circumstances that exist to justify their release. It would not be appropriate to release unallocated land from the Green Belt.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support the extension of the Green Belt to the south of Nailsea to maintain the separation of Nailsea and Backwell and prevent further encroachment into the countryside. **(Backwell PC, Nailsea TC, Flax Bourton PC, Brockley PC, Backwell RA Nailsea Action Group, Yatton Parish Council)**	Comments noted and support welcomed.
Support Policy SP7's proposal to remove 'Land at Lodway Farm, Pill and Easton-in-Gordano' from the Green Belt as it is considered to be grey belt. **(Barrett Homes)**	Comments noted and support welcomed.
Support for the proposed changes to the Green Belt in relation to land at Colliters Way. **(Barretts Bristol)**	Comments noted and support welcomed.
Bellway agree with the Council that exceptional circumstances exist, as set out, which justify the review and revision of Green Belt boundaries to help meet their needs in full, in accordance with	Comments noted and support welcomed.



Paragraph 145 of the NPPF. **(Bellway Homes, Bloor Homes - North of Pound Lane Nailsea site, Bloor Homes South West)**	
The proposed allocation of residential development on Land North of Pound Lane is supported. The northern parcel will remain within the Green Belt, to provide ecological mitigation associated with the southern parcel. The proposed location for the repositioned Green Belt boundary is supported in principle. **(Bloor Homes - North of Pound Lane Nailsea site)**	Comments noted and support welcomed.
I fully support these long overdue modifications to the Green Belt. **(David Sheridan)**	Comments noted and support welcomed.
Supports the principles of the Green Belt set out in draft Policy SP7 and welcomes that the Council proposes to recognise the 'exceptional circumstances' that exist to justify the release of land from the Green Belt and the meaningful review of Green Belt release in general given its varying quality and the need for homes. Without the release of land from the Green Belt, it is clear that the Council would not be able to meet its own housing requirements in the period to 2041. **(MacMic Strategic Land, Strongvox, Stephanie Fowelr, Taylor Wimpey)**	Comments noted and support welcomed.
Strongly support for the release of land to the north of the existing settlement edge of Nailsea, specifically the extent of land covered by our planning application 24/P/1586/OU2. This land constitutes grey belt land, and as such it is an obvious candidate for Green Belt release to provide much needed housing and employment land in a highly accessible location. **(Nailsea Holdings LVA LLP)**	Comments noted and support welcomed.
The loss of some Green Belt is an unavoidable consequence of the pressure to build sustainable housing and minimise the effects of climate change, whilst supporting the commercial viability of Bristol and surrounding areas, that are already heavily built up. The reasoning and logic of the policy is sound.	Comments noted.



(R Storrar)	
Despite pressures, North Somerset has generally been efficient at protecting Green Belt for both the local and wider area south of Bristol. The additional North Somerset housing numbers and proposals to expand further Bristol Airport require the best possible strategic solutions. We are pleased to see new areas of Green Belt proposed. Open green space of all types are vital for the health and wellbeing of the population. **(Wrington Parish Council)**	Comments noted.
Sport England promotes the development of outdoor sports facilities in the Green Belt including essential ancillary built facilities. **(Sport England)**	Comments noted.
Waddeton Park Limited strongly supports the proposed allocation of its land within the new local plan for development. However, it has drawn attention to the indicative site capacity and site requirements laid out for the Land at Pill Road in the Pre-Submission Plan. • The allocation should be worded to specifically 'permit up to 100 dwellings' and additionally 'support, but not require, a care home on the site' • the following requirement is removed from being a site requirement: "Active travel connection required between Pill Green and Land at Pill Road, crossing Markham Brook to enable creation of safe walking routes to schools, along with proportionate contribution to Markham Brook active travel overbridge."	Comments noted and addressed in the site-specific requirements in Schedule 1.
As discussed above we support the release of Green Belt land to help meeting housing targets and the allocations that are identified in the Policy. Furthermore, the incorporation of the NPPF Golden Rules within the policy is also welcomed. We have no objection to the draft Policy. **(Wain estates)**	Comments noted and support welcomed.
The maintenance of the Green Belt boundary in the vicinity of Wrington is supported.	Comments noted.



(Tony Harden)	
Yatton Parish Council is in favour of taking a fresh look at areas designated as Green Belt with a view to targeting development to areas where it is needed rather than just fitting it in where existing constraints are minimal: the latter approach has served Yatton very badly in the past and the village has been disfigured by a number of large, dense, identikit housing developments. **(Yatton Parish Council)**	Comments noted.
Suggested modifications:	
Policy SP7 should also be amended to refer to 175 dwellings rather than 160 dwellings for Land at Lodway Farm, Pill and Easton-in-Gordano. **(Barretts Bristol)** Policy SP7 should therefore be updated to make reference to meeting Golden Rules subject to viability, as per the NPPF **(Barretts Bristol).** Following wording suggested: o "New residential development will only be permitted on land released from the Green Belt, as defined on the Policies Map, where it is demonstrated how the development meets the 'Golden Rules' requirements as set out in the NPPF **unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability)."** Proposed extension of the Green Belt between Nailsea/Backwell should be removed. **(Gleeson, Stephanie Fowler)** Proposed new wording regarding the 'Golden Rules' affordable housing requirement: "New residential development will only be permitted on land released from the Green Belt, as defined on the Policies Map, where it is demonstrated how the development meets the 'Golden Rules' as set out in the NPPF, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability). **(Taylor Wimpey)** Remove housing figures from the policy. **(Catesby Estates)** The following wording should be added to Policy SP7: "Land at Royal Portbury Dock will be released from the Green Belt to meet the development needs of Bristol Port over the plan period."	

(Bristol Port Company)

Land should be removed from the Green Belt around Bristol Airport to reflect its ambitions for accommodation 15mmpa
(Bristol Airport)

Remove the allocation in the Green Belt land around Portishead
(Various)

Remove the allocations in the Green Belt around Pill and Easton-in-Gordano
(Various)

Remove the allocations in the Green Belt at Nailsea and Backwell
(Various)

Remove reference to Land at Woodspring, Pill / Easton-in- Gordano and Land at Nailsea / Backwell from the list of land to be released from the Green Belt as other sites outside the Green Belt should be allocated first
(Wall Holdings Ltd, Miller Homes)

Requests for land to be released from the Green Belt – see above
(Various)



SP8: Housing

Policy SP8: Housing	
Number of representations received: 110	
Number of objections based on policy being unsound: 81	
Not positively prepared: 60 Not justified: 65 Not effective: 67 Not consistent with national policy: 58	
Number of objections based on policy being not legally compliant: 26	
Number of objections based on policy being not compliant with Duty to Co-operate: 41	
Main Issues Raised:	**North Somerset Council Officer Response:**
General objection to scale of housing growth and/or where it is located and the broad distribution set out in this policy. References to infrastructure provision, or lack of, across the district and particularly at strategic locations. **(A.Morris, Abbots Leigh Parish Council, Adrian Mealing, Alex Layard, Backwell PC Nailsea TC Flax Bourton PC Brockley PC Backwell Residents Association and Nailsea Action Group, David Glynn, Emilia Leung, Fran Slade, JF Slade, Jeanne Craske, Kevin Payne, M Slade, Guy Stone, Paul Gardner, Penelope Riley, Portishead Town Council, Sadie and James Ryan and Family, T Crane, Sarah Snell, Susan Lamburne, David Cannon, Lizzie Slocombe)**	The housing requirement set out in this policy is the output of the standard methodology for calculating local housing need, the use of which is prescribed in national policy. The Local Housing Needs Assessment 2025 published as part of the evidence base explains this in further detail. The broad distribution of dwellings reflects the spatial strategy set out in Policy SP3, and the council is satisfied that sufficient infrastructure to accommodate the level of growth proposed has been identified in the plan. Infrastructure delivery is addressed further in the Infrastructure Delivery Plan.
Plan period should be extended to ensure 15 years post adoption. **(Ainscough Strategic Land, Barratt Bristol, Bellway Homes Ltd, Bloor Homes, Gleeson Land, Hallam Land, Harrow Estates, Lichfields Bristol, Persimmon Homes, Miles Estate, Miller Homes, Rubix Land Ltd Havyatt Green, Rubix Strategic Ltd, St Philips, Summerfield Homes Ltd, Taylor Wimpey/Crest Nicholson/Barratt/Redrow/Vistry Group, Taylor Wimpey/Crest**	It is the council's position that the plan period is appropriate, given the time taken to produce the plan throughout a period of national policy changes.

Nicholson/Barratt/Redrow/Vistry Group, Verto Homes, Wain Estates, Wall Holdings Ltd)	
A housing trajectory should be submitted with the plan. **(Ainscough Strategic Land, Barratt Bristol, Bellway Homes Ltd, Bloor Homes, Hallam Land, Hill Residential Ltd, Lichfields Bristol, Persimmon Homes, Rubix Strategic Ltd, St Philips, Wain Estates, Wall Holdings Ltd)**	Agreed. An indicative trajectory was included within the Strategic Housing Land Availability Assessment that was published as part of the Regulation 19 consultation evidence base, demonstrating sufficient supply. An updated housing trajectory will be submitted with the plan, with a base date of April 2025.
Whilst the plan meets the minimum number of homes required through the standard method the housing requirement should be higher to address evidenced affordable housing needs and supply should be increased to ensure sufficient flexibility to deliver the requirement. Currently as drafted it only has 795 units flexibility over the standard method output, there should be a 10% uplift. Other comments suggest an increase may be necessary to accommodate the additional population that may be generated by the level of economic growth the plan proposes. **(Ainscough Strategic Land, Barratt Bristol, Bellway Homes Ltd, Bloor Homes, Catesby Estates, Gladman Developments, Gleeson Land, Hallam Land, Harrow Estates, Hill Residential Ltd, Home Builders Federation, Latimer Developments Ltd, Lichfields Bristol, Miles Estate, Miller Homes, Rubix Land Ltd Havyatt Green, Rubix Strategic Ltd, Wain Estates, Wain Homes, Wain Homes Severn Valley, Wall Holdings Ltd)**	As set out in national policy, the overall aim should be to meet an area's identified housing need, with an appropriate mix of housing types for the local community, and strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. The evidence base includes the Local Housing Needs Assessment 2025 and an Employment sites and premises requirements evidence update report, which considers the workforce implications arising from the introduction of the standard method figure as the housing requirement.
Whilst the plan meets the minimum number of homes required through the standard method the housing requirement should be higher to address Bristol's unmet needs and contribute towards them. **(Ainscough Strategic Land, Barratt Bristol, Bellway Homes Ltd, Bloor Homes, Catesby Estates, Diverse Partnerships Yatton Ltd, Gladman Developments, Gleeson Land, Harrow Estates, Hill Residential Ltd, Home Builders Federation, Latimer Developments Ltd, Lichfields Bristol, Persimmon Homes, Mead Realisations Ltd, Miles Estate, Miller Homes, Nailsea Holdings**	It is accepted that Bristol City Council has identified unmet need, however their Local Plan remains in its examination phase and the quantum of unmet need has not yet been confirmed, nor has any work been undertaken with neighbouring authorities to look at how this should or could be apportioned. North Somerset Council is committed to working with the West of England authorities to produce a Spatial Development Strategy, as directed by the government. This is the appropriate mechanism to address the needs of the sub region as a whole.



LVA, Rubix Land Ltd Havyatt Green, Rubix Strategic Ltd, South West Housing Association Planning Consortium, St Philips, University of Bristol, Taylor Wimpey/Crest Nicholson/Barratt/Redrow/Vistry Group, Verto Homes, Waddeton Park Ltd Land South of Greenhill Road, Wain Estates, Wain Homes, Wain Homes Severn Valley, Wall Holdings Ltd, Woodstock Homes	
Suggested modification to Policy SP8 which would include a commitment to an early review of North Somerset's housing policies to reassess whether North Somerset could accommodate any the unmet housing needs arising across the West of England area. **(Bristol City Council)**	Work has already commenced on a joint plan, the West of England Spatial Development Strategy. North Somerset Council would expect to then produce a new local plan once this is finalised.
The Sustainability Appraisal does not test a higher growth option. **(Bellway Homes Ltd)**	The Sustainability Appraisal tests the housing requirement as set out in the plan, and different spatial options for delivering it. There is no basis for testing a higher figure, as explained above Bristol City Council's unmet need has not yet been quantified in their local plan, and nor has it been considered what proportion of any unmet need should be directed to North Somerset Council. This will be addressed in the emerging West of England Spatial Development Strategy.
Concern that delivery of some of the strategic sites may extend beyond the plan period, with reference to Lichfields Start to Finish timescales. **(Ainscough Strategic Land, Harrow Estates, Innova Consulting Services, Latimer Developments Ltd, Persimmon Homes, Nailsea Holdings LVA, Wain Homes, Wain Homes Severn Valley, Woodstock Homes)**	The allocations within the plan include a range of site sizes and types, and the housing trajectory demonstrates a robust supply of specific deliverable sites for the first five years of the plan period as well as sufficient specific developable sites and broad locations for growth for the remainder of the plan period, as required by national policy.
Specific objection to scale of growth around Nailsea and Backwell, request for particular sites to be deleted, and request for Nailsea and Backwell to be presented separately, with two separate figures. **(Backwell PC Nailsea TC Flax Bourton PC Brockley PC Backwell Residents Association and Nailsea Action Group, K Riches, T**	Objections to the Nailsea and Backwell strategic location are addressed under Policy LP3. Whilst they have been considered together as a strategic location, and a combined total is presented in the broad distribution for growth table in the policy, each of the sites proposed for allocation are listed individually within Policy LP5 Schedule 1.



Crane)	
Request for clarity that the housing requirement of 23,700 homes is a minimum. Suggestion that table within policy should be amended to state 'minimum dwellings' and the percentages column should say 'broad' proportion. **(Mac Mic Strategic Land, Barratt Bristol, Mead Realisations Ltd)**	This is not considered necessary. The policy text is clear that the 23,700 homes is a minimum and that the figures and percentages indicate the broad distribution. Both points are therefore adequately covered.
Windfall figures should not be included in the supply as this will be unallocated unplanned growth. Queries over justification for inclusion of the windfall allowance. Suggestion that windfall figures should not be included for first three years of plan period to avoid double counting. **(Barratt Bristol, Dan-Clarke Hall – Gibson Architecture, Hallam Land, Home Builders Federation, Innova Consulting Services, LiveWest, Mead Realisations Ltd, Nailsea Holdings LVA, Woodstock Homes)**	The NPPF permits inclusion of a windfall allowance as part of he anticipated supply, provided compelling evidence can be provided. The justification for this is set out in the Strategic Housing Land Availability Assessment. There is no double counting in the figures, as these are based on trend data.
Analysis of historic build rates in North Somerset suggests that the number of homes that come forward will be far short of the housing requirement set out. Additional policy proposed, entitled 'Ensuring reasonable build-out time'. **(D A Gray)**	These concerns are understood and it is agreed that the housing requirement in the plan is significantly higher than previous annual average build rates, however it is considered that a policy such as that proposed would conflict with national policy.
This policy is silent on the types of housing that should be provided. **(John Polden)**	This is covered in Policy DP46: Housing type and mix.
Sites with planning permissions should be deleted from the site allocations. **(Wall Holdings Ltd)**	Disagree. It is entirely appropriate to include sites with planning permissions as allocations and within the anticipated supply.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support policy approach and broad distribution of growth. **(Autograph Homes, Bath and North East Somerset Council, Environment Agency, Kath Scargill, National Farmers Union, National Highways, Phoenix Life Ltd, R Storrar, South West**	Noted.

Housing Association Planning Consortium, Strongvox Ltd, Taylor Wimpey – Grove Farm and Burnt House Farm, Taylor Wimpey Youngwood Lane, Peter and Susan Gearing)	
Support use of standard method to derive housing requirement. **(Bellway Homes Ltd, Taylor Wimpey/Crest Nicholson/Barratt/Redrow/Vistry Group, Waddeton Park Ltd Land South of Greenhill Road)**	Noted.
Suggested modifications:	
Housing requirement should be increased, suggestions of by 10% over standard method output, other suggestions with an unquantified amount to address unmet needs from neighbouring authorities. **(Ainscough Strategic Land, Barratt Bristol, Bloor Homes, Catesby Estates, Gleeson Land, Hallam Land, Harrow Estates, Innova Consulting Services, Latimer Developments Ltd, Lichfields Bristol, Mead Realisations Ltd, Miles Estate, Miller Homes, Nailsea Holdings LVA, Rubix Land Ltd Havyatt Green, Rubix Strategic Ltd, St Philips, University of Bristol, Taylor Wimpey/Crest Nicholson/Barratt/Redrow/Vistry Group, Verto Homes, Waddeton Park Ltd Land South of Greenhill Road, Wain Estates, Wain Homes, Wain Homes Severn Valley, Wall Holdings Ltd, Woodstock Homes** Plan period should be extended to ensure 15 years post adoption. **(Ainscough Strategic Land, Barratt Bristol, Bellway Homes Ltd, Bloor Homes, Gleeson Land, Hallam Land, Harrow Estates, Lichfields Bristol, Persimmon Homes, Miles Estate, Miller Homes, Rubix Land Ltd Havyatt Green, Rubix Strategic Ltd, St Philips, Summerfield Homes Ltd, Verto Homes, Wain Estates, Wall Holdings Ltd** Request for Nailsea and Backwell to be presented separately, with two separate figures. **(Backwell PC Nailsea TC Flax Bourton PC Brockley PC Backwell Residents Association and Nailsea Action Group, K Riches** Table within policy should be amended to state ‘minimum dwellings’ and the percentages column should say ‘broad’ proportion. **(Barratt Bristol)** Bristol City Council suggests a modification to Policy SP8 which would include a commitment to an early review of North Somerset’s housing policies to reassess whether North Somerset could accommodate any the unmet housing needs arising across the West of England area. The suggested modification is to incorporate the following wording into Policy SP8: ‘The appropriate level of new homes will be subject to an early review following the adoption of the Local Plan in order to take account of any unmet housing needs of neighbouring authorities where these can be accommodated, in the context of the emerging Spatial Development	

Strategy for the West of England area.'
(Bristol City Council)

Proposed additional policy:
Ensuring reasonable build-out time
In any year, the number of homes on permitted sites that remain to be build-out equates to the number of homes that the permissions anticipate would have been started by that year less the number of homes that have been completed.
Planning applications may be refused if information from monitoring indicates that the number of homes that remain to be built-out on permitted sites already exceeds what is likely to be built-out in a reasonable time by the industry's current resources.
(D A Gray)



SP9: Employment

Policy SP9: Employment	
Number of representations received: 25	
Number of objections based on policy being unsound: 12	
Not positively prepared: 5 Not justified: 8 Not effective: 11 Not consistent with national policy: 5	
Number of objections based on policy being not legally compliant: 2	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Highlight the importance of strong active-travel connections to ensure the new community integrates with Weston-super-Mare, rather than functioning as a detached, standalone settlement. **(Ainscough Strategic Land)**	Noted – the proposals for Wolvershill require a package of transport interventions including multiple new and improved active travel connections back into Weston-super-Mare. These are being considered by the council in discussion with developers at Wolvershill, Active Travel England and National Highways.
Objection that the employment strategy is not market-responsive, as the proposed employment land supply is not aligned with current market demand or structural changes in the commercial sector. The plan fails to positively plan for key growth sectors such as manufacturing, industrial, and logistics, despite national policy requiring uplift in these areas. It is considered that the evidence base is not properly reflected in the plan, and that national economic policy, industrial strategy, and regional strategies (including South West strategy) have not been integrated into SP9. The North Somerset Economic Growth Plan (2025) strongly supports the need for additional logistics land and warns of losing investment to competing areas if strategic sites are not unlocked. **(Hallam Land)**	The employment land supply has been informed by evidence of future demand for employment land as well as assessment of spatial requirements for employment land. The supply of land also reflects the overarching spatial strategy for growth as set out in Policy SP3 that seeks to focus growth in and around existing urban centres. There is considered to be a supply of land to meet forecast sector growth. It is considered that the plan is based upon a robust evidence base, however there will always be choices around the specific distribution of employment land even within the same spatial strategy.
Promotion of omission site: Land East of Clevedon (Junction 20,	Whilst officers acknowledge the economic opportunity presented by the



M5). It is argued that removing this site from the earlier Draft Plan represents a missed strategic opportunity. The site is suitable for: ○ logistics and distribution ○ advanced manufacturing ○ supply-chain support for the Agratas gigafactory (Somerset) The evidence shows the site could meet modern industrial needs and national industrial strategy priorities but has been discounted without justification. **(Hallam Land)**	Junction 20 commercial proposal, it is not considered necessary to include the site for a 'sound' local plan. The Council decided to remove this proposal from an earlier draft based upon consultation feedback, consideration of local constraints, and consideration of the infrastructure requirements necessary to facilitate it i.e. a new connection from the M5, J20. Weighing the balance of factors, the Council have decided not to propose the large-scale business park in this local plan reflecting that there is no necessity to accommodate this development in sensitive land with a high-probability of flooding, landscape and other harm. Going forward, NSC is working on the Spatial Development Strategy with other local authorities in the West of England and the mayoral combined authority, and this is anticipated to provide a sub-regional strategy for economic growth based upon evidence prepared on a sub-regional basis, notably the Employment Land and Spatial Needs Assessment (ELSNA). This is appropriate as the West of England geography is identified as a Functional Economic Market Area (FEMA) where it is appropriate to consider the overarching land supply opportunities and strategic scale logistics is anticipated to feature in this consideration.
There is an imbalance between new homes and new jobs. The uplift in housing from the previous Reg 19 stage has not been matched by a proportional uplift in employment land. The updated evidence base shows need for 50–60 ha of employment land, and 20,000 additional jobs (2023–2043), yet the plan reduces employment land provision and relies on small mixed-use allocations, which it is argued do not meet strategic employment needs. **(Hallam Land)**	The plan now has an increase in employment land provision compared to earlier drafts, and is informed by the evidence on the demand for employment land over the plan period as set out in the HJA 2023 study and 2025 Addendum. A summary of the evidence base is provided in the Justification text to policy SP9. The evidence has considered the relationship between the economic evidence and the proposed housing supply to ensure an overall sustainable balance can be achieved.
There is insufficient provision for logistics and industrial sectors as the evidence shows a shortage of suitable sites and an ageing stock of industrial premises in North Somerset. Demand for large units (100,000 sq ft +) is high; the pipeline within North Somerset is minimal compared to neighbouring areas (e.g., Severnside, Somerset). Market analysis shows recent delivery is extremely	Addressing needs for logistics and warehousing is considered to be an issue relevant to both the Local Plan 2041 and a strategic issue with cross-boundary implications for the West of England as a whole (see Duty to Cooperate Statement of Compliance Update paper (April 2026)). The approach of addressing strategic logistics needs through the SDS is supported by evidence produced by HJA for the Local Plan (North



limited. **(Hallam Land)**	Somerset Employment Sites & Premises Requirements Evidence Update, March 2025. The Employment land and Spatial Needs Assessment (ELSNA) workstream has already commenced, and will form a core element of the SDS evidence base. It will be considering strategic issues across the sub-region relevant to economic growth and this will include logistics sector. This will inform the distribution of any supply at the sub-regional scale with future local plan work being developed in this context. This is expected to have a key role in informing land supply requirements in the medium to longer term. In the short-term, the Local Plan 2041 provides a range of sites that provide some immediate opportunity to meet logistics needs including sites with recent planning consents near Clevedon, and at Weston-super-Mare, both of which close to the M5 motorway. The Local Plan 2041 itself provides a sufficient range of sites, to accommodate the proposed employment land requirements over the plan period; the review of needs and distribution via the SDS, and subsequent local plans will provide another mechanism to consider spatial distribution, including the land promoted by Hallam Land.
Policy SP9 is not considered to be sound as HBF believes the Plan needs to do more to recognise the links between housing and employment and the impacts that failing to provide sufficient housing will have on the economic performance and competitiveness of Bristol City Region. There is also a need for a clearer link and explanation between the spatial strategy, housing and employment allocations and the topic specific policies later in the Plan. Employment allocations and opportunities within a particular housing market area could give rise to an additional housing need that should be accommodated within that area. The failure to provide new housing close to where people work results in longer commuting times, less sustainable patterns of development and harms the economic performance of an area. **(Home Builders Federation)**	The Local Plan 2041 has at its core a robust spatial strategy for growth that seeks to focus growth of housing and employment in close proximity to the main urban areas, including Bristol. Accordingly, the majority of proposed employment land is directed to Weston-super-Mare and Wolvershill, Nailsea and Backwell, Portishead, and the proposed Woodspring Strategic Location, alongside significant housing allocation in these areas. The evidence has considered the balance between the proposed housing requirement in terms of labour supply, and the scale of employment land proposed and we consider an appropriate balance is struck in the plan so that additional pressure for out-commuting is not created. Notwithstanding that, the economic pull of Bristol is clear and there will remain a degree of commuting from the surrounding authority areas. The Local Plan recognises this and there are wider proposed improvements to access for example on improved bus services, active travel connections and in future, Mass Transit.
Concern that the small amount of employment land in Backwell	The provision for new employment land in Backwell is considered

conflicts with the goal of creating balanced communities, and that a lack of employment provision at Pill causes the same issue. **(Jeanne Craske, Justin Saunders, Maureen Butterly)**	proportionate compared to the overall development directed to Backwell. As existing, there will remain a component of out-commuting from Nailsea to other locations including Bristol and the location has a range of public transport options to service this with planned improvements to bus services on the main A370 corridor and proposals to enhance connectivity to the train station. Whilst Pill has been identified as a strategic location for additional housing, it is not considered a preferred location for new employment development, although some additional employment would be created at the new proposed primary school.
Policy SP9 indicates and area of employment land of 9 hectares as in Clevedon. However, the proposed site is in the parish of Kenn. **(Kenn Parish Council)**	The parish boundary is noted, however in functional terms, the site is well-related to Clevedon, similar to the Clevedon 5/20 business site. It is relevant also that some comments suggest the settlement boundary of Clevedon should be extended southwards to take in the business park.
Nailsea Action Group notes that 1.1 hectares of employment land has been allocated to Nailsea. Also noted is that the Nailsea and Backwell area does not feature in Schedule 2, employment sites. This Policy (SP9) states that there is 72.8 hectares allocated for employment in North Somerset, whereas Schedule 2: Employment sites only lists 53.7 hectares. The 1.1 hectares is too small for a town that is expecting such a large number of new dwellings. **(Nailsea Action Group, Wraxall and Failand Parish Council)**	Nailsea and Backwell, in addition to Wolvershill and Woodspring do not feature in Schedule 2 because specific employment sites are not identified on the Policies Map. Instead, the employment provision directed to these areas is set out in the relevant Locational Policy. This approach accounts for the discrepancy in the employment land supply figures. Precise boundaries for employment land will be identified through masterplanning of these sites.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support for Policy SP9 and Weston-super-Mare's economic role. Support for the the policy's aim of reinforcing Weston-super-Mare as the main economic centre and agree that employment at Wolvershill should be viewed within this broader local context. **(Ainscough Strategic Land, Wain Estates Wolvershill)**	Support welcome and noted.
Support for the updated 3 hectare employment requirement in the Reg 19 plan. **(Ainscough Strategic Land, Bloor Homes South West, Wain Estates Wolvershill)**	Comments noted.
Weston-Super-Mare is the principal settlement and remains the	Comments noted, and North Somerset will continue to work with



focus for new employment growth, continuing the objective of encouraging greater self-containment and reducing out-commuting. Over the period 2023-2043 Cambridge Econometrics forecast economic growth equating to growth of 10,300 jobs, with Oxford Economics forecasting growth of 7,100 jobs. A strategically significant allocation of 10ha of business land is also proposed in the Woodspring area (adjacent to south west Bristol). The strategy for employment land provision within the North Somerset Local Plan is broadly supported. Ongoing dialogue on the implications for B&NES communities, including through commuting patterns, as well as on the longer-term strategy would be welcomed. **(Bath and North East Somerset Council)**	neighbouring authorities on cross boundary matters. Note that a proposed change is made to the plan, reducing the quantum of employment proposed at the Woodspring development to 6 hectares, rather than 10 hectares, as explained in responses to Policy LP2: Woodspring Strategic Location.
Draft policy SP9 proposes to allocate 72.8ha of employment land (excluding the Epic campus) across the region. The overarching objective to deliver an increase in jobs and improve the local economy is commendable. Within the policy justification, recognition has been shown of the economic growth opportunities for the local area that may arise as a result of the Epic employment campus. This statement is supported by Epic, and it is pleased to see that the Council has taken a positive view of the important role the Epic employment campus will play within the economic context of North Somerset and the wider region. **(Epic Systems)**	Support welcomed.
Policy SP9 proposes that Weston-super-Mare will remain the main focus for employment growth, with the committed Weston Villages development, allocated employment land at the J21 Enterprise Area, and additional employment land within the strategic locations at Wolvershill, Woodspring, and Nailsea and Backwell. The spatial distribution of employment land is supported by National Highways, but we will seek to ensure that the cumulative impacts of employment travel are planned for and addressed as necessary. **(National Highways)**	Support noted. The Transport Assessment has considered the employment land supply.
The wording of Policy SP9 on employment is supported. Homes	Noted.

England welcomes the move away from the previous Local Plan requirement of 1.5 jobs per home within Weston-super-Mare. **(Homes England)**	

Suggested modifications:

In order to make the plan sound, some 25 of land East of J20 at Clevedon should be allocated as a strategic employment site to proactively meet the evidenced demand from the distribution, logistics, and warehousing sector.
(Hallam Land)

LP4 needs to be withdrawn and local employment opportunities provided as part of an integrated plan in the same way as other strategic locations.
(Justin Saunders)

Page 35 needs to be amended to state Kenn and not Clevedon. The 9ha proposed employment site is with the parish of Kenn.
(Kenn Parish Council)

It would be better to make some of the allocations of land around Pill for economic developments that make use of the high grade agricultural land for farming related diversification businesses such as cider orchards, market gardens or flower farms to supply Bristol.
(Lucy Byrne)

Summary of Required Modifications for SP9 to be sound, the Local Plan must:
• align the housing distribution with the employment strategy; • ensure strategic housing areas have local employment or excellent sustainable transport links; • provide robust commuting and transport evidence; • maximise brownfield employment opportunities first; • demonstrate cross-boundary co-operation; • revise or reduce allocations where infrastructure cannot support sustainable commuting. Without these changes, SP9 fails the soundness tests of justification, effectiveness, and consistency with national policy.
(Maureen Butterly)

Either securely identify and allocate far more land for employment or reduce the housing plans for Nailsea so that what is provided will meet the needs of the present and future population and prevent a great deal of commuting.
(Nailsea Action Group)



SP10: Transport

Policy SP10: Transport	
Number of representations received: 48	
Number of objections based on policy being unsound: 35	
Not positively prepared: 15 Not justified: 20 Not effective: 30 Not consistent with national policy: 15	
Number of objections based on policy being not legally compliant: 11	
Number of objections based on policy being not compliant with Duty to Co-operate: 10	
Main Issues Raised:	**North Somerset Council Officer Response:**
Allocations in Congresbury don't reflect the principles for transport set out in SP10, making SP10 undeliverable in practice. No assessment of impacts or strategic transport improvements (both highway network and active travel) for Congresbury despite allocations for housing. **(Adrian Mealing)**	This policy is strategic in nature and provides an overarching context and approach to transport. Schemes relevant to individual sites will be identified within the planning application process.
Active travel options in Pill/Easton-in-Gordano are limited (including east–west connectivity and access to the Port for employment) and the plan lacks a structured, deliverable transport strategy to match the proposed growth. The proposed active travel route from the largest site would damage ancient woodland and would not address wider access issues, and there is no meaningful bus service planning, no rail capacity improvements beyond an hourly service, and no clear plan for M5 Junction 19 or the A369. **(Justin Saunders)**	A scheme to mitigate impacts on M5 J19 is in development with National Highways. A bus service improvement scheme on the A369 will improve bus journey time and reliability. An active travel route connecting sites either side of Martcombe Brook (which facilitates access to education and local /community services) has an indicative alignment, this is to be agreed through a planning application with alternative provision being provided if crossing of the Brook is not viable.
There is an inadequate transport evidence base for the Pill Strategic Location. No cumulative transport assessment of Pill and Portishead growth has been undertaken, and active travel routes shown at Pill are undeliverable. There are concerns that more safe cycle routes	The Transport assessment that forms part of the Local Plan evidence base covers the entire NSC network and strategic model scenarios test cumulative impacts of all proposed development. Mitigations have been identified in line with the principles of Vision Led approach and



are needed. There is an over-reliance on the proposed rail station/service without firm evidence that rail and bus capacity will be sufficient, and that the Plan does not show how additional traffic impacts (including noise, vibration and air quality) would be mitigated or how required infrastructure would be modelled, funded and deliverable. The Local Plan does not address potential traffic congestion at on the A369 or at Junction 19 of the M5. **(Easton-in-Gordano Parish Council, Nicholas Ball, Maureen Butterly, Kevin Payne, Lucy Byrne, William David Billington, Wayne Davey)**	national policy. The active travel routes are considered deliverable in principle, alignments given are indicative and may change subject to feasibility. A Scheme to mitigate impacts on M5 J19 is in development with National Highways.
Development on the five proposed sites in Pill & Easton-in-Gordano relies heavily on the Portishead – Pill – Bristol Railway line which it states has secured government funding and is due to be delivered by 2028 and would provide direct rail links to Bristol Temple Meads railway station. However, the railway does not yet exist and when it does there will only be 2 trains per hour. **(P Sterndale)**	The rail provision will contribute towards an increase in existing public transport capacity that will enable mode-shift.
Inadequate transport infrastructure is proposed in Nailsea and Backwell. Concerns that the railway station is inaccessible for passengers and that bus services are not adequate particularly to the north of Nailsea. Alternative suggestions to the cross rail link road that has been identified in the plan are made. **(James Joseph Sullivan, J Palmer, Jeanne Craske, Kate Wickens, Tickenham Parish Council, Wraxall and Failand Parish Council)**	The Nailsea and Backwell Transport Mitigations Strategy (Appendix E to the Transport Assessment) identifies a package of mitigations around Nailsea and Backwell. Land is then safeguarded for these mitigations in the Local Plan, and they are further detailed in the IDP. The plan and the IDP also identify a need for improvements at Nailsea and Backwell railway station. Alternative transport mitigations have been considered, and subsequently discounted, as detailed in the evidence.
Transport plan needs to be far more imaginative and bolder. **(Mr D Wheeler)**	Our transport plans are robust and Vision Led, which is considered to be bold whilst remaining realistically achievable.
The proposed transport infrastructure requirements are undeliverable, especially the proposed Cross Rail Link, and ignore local constraints. **(Emilia Leung, Nailsea Action Group)**	Work on a business case for the Cross Rail Link is progressing, and the scheme is considered deliverable, with anticipated costings and funding mechanisms detailed in the Infrastructure Delivery Plan.
SP10 transport objectives cannot be achieved as the plan directs	Proposed allocations have been identified through a sound and robust



majority of growth to unsustainable locations such as Wolvershill, Banwell. Policy SP10 is neither effective nor consistent with national planning policy. The NPPF requires transport policies to promote sustainable patterns of development based on accessibility. Additional residential allocations should be provided closer to Bristol, such as Failand, to reflect travel to work patterns and where people work. **(Harrow Estates, Mead Realisations)**	process, as set out in the Spatial Strategy, Site Selection and Capacity Paper. Strategic development locations have been based on proximity to existing urban centres, where active travel infrastructure can be developed for shorter journeys, and on key public transport corridors. At Wolvershill, Policy LP1 requires a package of transport interventions and design approach to minimise the carbon impact of transport through limiting the need to travel and prioritising walking, wheeling and cycling and the use of public transport opportunities.
Concern over the increase in dwellings allocated to the Wyndham Way Broad Location and whether this is effectively assessed through the transport model. The sites at Tower Farm and Black Rock in Portishead will also have a substantial impact on local transport routes. **(Ian Slatter, J Wills, Jane Mather)**	Strategic model scenarios have tested cumulative impacts of all proposed Local Plan developments (including the proposed dwelling figure within the Wyndham Way Broad Location) and this modelling is considered robust.
Whilst we are supportive of development that is connected appropriately to transport facilities and services, we note that bullet 3 requires development proposals to deliver "… better local bus, rail and rapid transit services and infrastructure supporting uptake in public transport use for journeys to work, leisure and other purposes.". The policy does not provide adequate clarity as to how all these requirements must be demonstrated or achieved. The Policy should provide clarity over how the uptake in public transport will be achieved. Further, the Policy should reference how improvements will be funded – through CIL or S106 contributions. **(Marcus Plaw Persimmon Homes)**	Comment noted and agreed that a modification could clarify. As it is not entirely in the developer's ability to deliver better bus services, the policy is proposed to be amended to clarify the role development has in facilitating improvements. The proposed change clarifies by referring to the use of planning obligations and site work to facilitate delivery.
Whilst the policy objectives are supported, with a focus on improving safety, reducing the need to travel and promoting sustainable travel, it should be noted that National Highways will continue to seek appropriate transport investment and capacity enhancements where the residual cumulative impacts of development are severe. **(National Highways)**	Noted. We will continue to engage with National Highways with a view to developing appropriate mitigations to facilitate road safety improvements and capacity enhancements where required.
Thorough consultation with rural communities will be required for Mass Transit.	Additional consultation on scheme development will be provided where required within the planning process.



(Nempnett Thrubwell Parish Council)	
Support/Other Comments:	**North Somerset Council Officer Response:**
Pleased to see that Yatton Station is intended to become a transport hub. Part of this should be the establishment of good public transport links with a frequent bus service (i.e. at least 2 buses per hour) serving Clevedon, Weston-super-Mare and Bristol. The provision of free parking at the station would make a significant positive difference to its usefulness as a hub and also to the lives of Yatton residents living near the station. **(Yatton Parish Council)**	Support noted, acknowledging that car parking charges are not within the remit of the Local Plan.
Support implementing better public transport infrastructure that would go further to enhance the work the council has been doing to reduce greenhouse gas emissions. **(Nancy Wedin)**	Noted.
Suggested modifications:	
To make SP10 sound, the Plan must include: A fully costed and funded transport infrastructure package for Congresbury, including: A370 corridor upgrades and junction improvements, A safe, continuous walking and cycling route connecting all three housing allocations to village services, Funded pedestrian crossings (including Smallway junction), Public transport frequency improvements and service guarantees, New or improved bus priority measures. An evidence-based transport modelling assessment showing whether Congresbury can support the planned growth without severe residual impacts. Clear phasing requirements linking housing delivery to completion of active travel and highway improvements. Without these changes, SP10 remains unjustified and undeliverable. **(Adrian Mealing)** To make SP10 sound and deliverable it must be amended to state: “No development at the Pill & Easton-in-Gordano Strategic Location (Policy LP4) shall commence until M5 Junction 19 capacity improvements are completed, funded and open to traffic.” And “The safeguarded active travel route across Markham Brook (Schedule 7) shall be deleted or re-routed to avoid all ancient woodland and its 15-metre buffer zone.”. **(Easton-in-Gordano Parish Council)** For Policy SP10 to be effective and deliverable, the distribution of growth must reflect transport evidence and enable sustainable travel patterns. This is only achievable by allocating development at highly accessible eastern settlements such as Failand, rather than concentrating growth in locations known to exacerbate long-distance car commuting. Without realignment of the spatial strategy to follow the transport evidence, Policy	

SP10 cannot be considered justified or consistent with the NPPF's requirement to promote sustainable transport and reduce the need to travel**.**
(Harrow Estates)

A new Transport Assessment document is required, with public consultation on the proposed measures such as BSIP schemes and properly evidenced, realistic modelling based on accurate housing numbers. The impact on roads immediately next to developments such as Tower Farm should also be included.
(Ian Slatter)

[Addressing the Tower Farm proposal] Add extra access route, coming from North Weston, in order that all vehicles do not have to travel through an already contested Portishead town centre.
(Jane Mather)

To make SP10 sound, the Council must provide cumulative transport modelling for Junction 19 and all local roads affected by strategic growth, including the A368 and Pill Road, and demonstrate that necessary infrastructure and public transport capacity will be deliverable and funded. Noise and vibration mitigation must be properly assessed and included in the policy.
(Justin Payne)

The Policy should provide clarity over how the uptake in public transport will be achieved. Further, the Policy should reference how improvements will be funded – through CIL or S106 contributions.
(Persimmon Homes)

1. Require cumulative transport modelling for all strategic development locations before adoption of the Plan.

Insert policy text requiring full cumulative transport modelling for all strategic allocations, including impacts on:

- M5 Junction 19,
- the A369 corridor,
- routes into Bristol,
- junctions within Portishead and surrounding villages.

Require this modelling to be completed and published before the Green Belt is released or allocations are confirmed. If modelling demonstrates unsustainable impacts, reduce or remove the associated housing allocations.



2. Amend SP10 to require transport infrastructure for strategic sites to be identified, costed, funded and deliverable before development proceeds

Add wording that major development will only be permitted where the necessary transport infrastructure is secured upfront, through:

- committed funding,
- identified delivery bodies,
- clear phasing plans.

Require each strategic site to produce a Transport Infrastructure Delivery Plan (TIDP) prior to planning approval.

3. Remove reliance on uncommitted or uncertain rail improvements (e.g., Portishead Line) as justification for strategic allocations. The Plan assumes future rail provision that is not guaranteed.

Amend SP10 to state that strategic allocations must not rely on rail infrastructure that is not fully committed, funded and scheduled for delivery within the early Plan period. • Reassess allocations—especially Pill/E-in-Gordano—without assuming new rail service availability.

4. Insert a requirement for all strategic allocations to demonstrate realistic, deliverable modal shift away from the private car Currently, the Plan sets a hierarchy but does not require development to prove that modal shift is achievable. Required modifications: • Add policy text requiring strategic sites to submit evidence on: o expected modal split, o walking and cycling catchments, o bus service viability, o long-term public transport commitments. • Where modal shift cannot be achieved (e.g., Pill/E-in-Gordano), reduce or remove site allocations.

5. Require deliverable active travel networks—with maps, phasing and costings—for all strategic development locations The policy obliges development to prioritise active travel but provides no evidence it is feasible in constrained areas. Required modifications: • Insert a requirement that active travel routes must be: o mapped, o continuous, o safe, o fully funded, and o deliverable within early phases of development. • Require feasibility studies for constrained areas (e.g., steep topography, narrow roads in Pill/E-in-Gordano). • Remove development allocations where such networks cannot be delivered.

6. Strengthen the link between SP10 and the spatial strategy (SP3) to prevent major development in car-dependent rural locations SP10's objectives are incompatible with allocating 1,100 homes in Pill/E-in-Gordano. Required modifications: • Add wording that major development must be located where walking, cycling and public transport are already viable or can be delivered in a realistic and evidenced manner. • Require reassessment of Pill/E-in-Gordano's strategic designation against these criteria.

7. Insert an explicit requirement for Duty to Co-operate engagement with National Highways, Bristol City Council, and WECA on transport impacts Strategic transport issues cross boundaries. Required modifications: • Add wording requiring documented Duty to Co-operate discussions about



infrastructure needs, congestion impacts and sustainable travel provision. • Require the Plan to be modified where cross-boundary issues remain unresolved.

8. Include a policy safeguard preventing development that increases congestion or carbon emissions where mitigation is not deliverable. This ensures consistency with SP1 (sustainable development) and SP2 (climate change).

Add a clause stating that development will not be permitted where transport impacts cannot be mitigated without unacceptable congestion, safety impacts or increased carbon emissions. • Reassess strategic allocations, particularly at Pill/E-in-Gordano, under this principle. Summary of Required Modifications SP10 can only be sound if: • cumulative transport modelling is undertaken and published; • transport infrastructure delivery is secured up front; • strategic allocations do not rely on speculative rail improvements; • active travel feasibility is demonstrated; • development is directed away from inherently car-dependent rural locations; • cross-boundary transport issues are addressed; • allocations are reduced or removed where transport impacts cannot be mitigated. Without these changes, SP10 fails the tests of justification, effectiveness, and consistency with national policy.
(Maureen Butterly)

New development (add...**should, as far as possible where reasonable and proportionate**,) (remove ..~~must~~) be located and designed to minimise the carbon impact of transport through limiting the need to travel and prioritising walking, wheeling (this includes wheelchairs, mobility scooters and other wheel-based mobility aids) and cycling and the use of public transport opportunities. In order to facilitate the delivery of net-zero emissions and reduce the adverse environmental effects of transport, development proposals and transport schemes (add..**should consider**) (remove.. ~~must address~~) the following principles in line with the following hierarchy: • Delivery of attractive, safe, and inclusive routes for walking and cycling which are well integrated into existing networks and provide access to effective and frequent public transport. • Delivery of better local bus, rail and rapid transit services and infrastructure supporting uptake in public transport use for journeys to work, leisure and other purposes. (remove...~~This includes journeys within and between towns in North Somerset and further afield including, better connections to, from and within the rural areas, journeys to and from public transport connections (known as first and last mile provision), new and improved bus stops and the reallocation of highway space~~); and • Delivery of infrastructure to facilitate the use of electric vehicles. Adequate parking for motor vehicles and cycles must be provided and managed to meet the needs of anticipated users (residents, workers and visitors) in usable spaces. The improvement of strategic transport facilities at Bristol Airport and Royal Portbury Dock will be supported subject to the policy guidance set out elsewhere in the local plan. The justification to policy SP10 refers to the growing health emergency although the Council does not provide any specific details of how these issues have been considered through the evidence base. This should be addressed.
(Mead Realisations Ltd)

A proper assessment of the issues facing the A369 in view of the extra traffic created by the development
(Nicholas Ball)



To make SP10 sound and deliverable it must be amended to state: “No development at the Pill & Easton-in-Gordano Strategic Location (Policy LP4) shall commence until M5 Junction 19 capacity improvements are completed, funded and open to traffic.” And “The safeguarded active travel route across Markham Brook (Schedule 7) shall be deleted or re-routed to avoid all ancient woodland and its 15-metre buffer zone.”
(Pill and Easton-in-Gordano Parish Council)

Revisit the Vision and strategic approach: Acknowledge that the “one-size-fits-all” vision does not work for all settlements. Tailor the vision and strategic priorities to reflect the unique characteristics and constraints of Nailsea and Backwell. Commit to tailoring policies to local circumstances. This includes recognising that Nailsea and Backwell cannot accommodate a large proportion of the district’s housing growth without first resolving fundamental infrastructure problems.

Require infrastructure to be delivered before housing: State unequivocally that development cannot proceed until key transport schemes (identified through LP 11) are funded, consented and programmed for early delivery. Tie housing occupations to these infrastructure milestones via planning obligations or conditions.

Update LP 11 and Schedule 7: Include Nailsea-specific infrastructure (i.e the rail crossing, highway widening or bypass schemes for Station Road and the B 3130, and station accessibility works) as formal allocations or safeguarded routes. Without such designation, these improvements will not attract funding or protect corridors from piecemeal development.

Embed DP 14’s highway-safety requirements into SP10: Require developers to demonstrate, through independent Road Safety Audits, that their proposals will not exacerbate existing hazards at pinch points and junctions. If cumulative impacts are severe, scale back or refuse developments until solutions are in place. Recognise that the unique geography of Nailsea’s roads may make compliance impossible for schemes of the size proposed.

Align DP 15 - DP 18 with local realities: Where active-travel improvements (DP 16) or travel plans (DP 18) are proposed, require them to be evidence-based and deliverable. For example, cycle routes should connect Nailsea and Backwell residents to actual employment, retail and education destinations within the town. If those destinations do not exist, require mixed-use development to provide them. Ensure that public-transport improvements (DP 17) include accessible, step-free routes and bus shelters designed for people with disabilities. Ensure that active-travel measures, public-transport improvements and travel plans are realistic and linked to local destinations.

Reconsider the employment land strategy: Focus employment provision within Nailsea town centre or accessible locations rather than on greenfield peripheries. encourage investment and thus employment into the town centre or within walking distance of homes, rather than on greenfield peripheries. Provide incentives for SMEs, co-working hubs and creative industries to occupy vacant town-centre units.



Address parking comprehensively (DP 19):Before approving major development, require a holistic parking strategy that: Assesses existing public and private parking capacity; Provides additional public parking and EV charging where necessary; Implements controlled parking zones to prevent pavement parking and protect pedestrian safety; Incorporates inclusive design, recognising the needs of people with disabilities; Includes enforcement mechanisms to prevent overspill onto narrow roads. Recognise that restricting parking without viable alternatives increases congestion and harms health and safety.

Provide suitable transport infrastructure to cater for the proposed approximately 4,000 house developments in Nailsea and Backwell, in terms of: 1. the construction of a road link between Nailsea and Clevedon using existing and improved roads as shown on the plan attached to this response. 2. infrastructure improvements to The Causeway, Washing Pound Lane and Church Lane to make these routes more attractive to those travelling by active modes, and less attractive to general traffic.
(Tickenham Parish Council)



SP11: Historic and natural environment

Policy SP11 Historic and natural environment	
Number of representations received: 44	
Number of objections based on policy being unsound: 30	
Not positively prepared: 16 Not justified: 25 Not effective: 27 Not consistent with national policy: 23	
Number of objections based on policy being not legally compliant: 8	
Number of objections based on policy being not compliant with Duty to Co-operate: 7	
Main Issues Raised:	**North Somerset Council Officer Response:**
The policy refers to strategic gaps, which are 'strategic' in nature and, like the Green Belt, not for the purposes of highlighting or assessing landscape or other character or quality; they are simply a tool for resisting development. This should therefore be omitted from the policy as it unduly conflates specific characteristics with spatial planning initiatives. **(Strongvox Ltd, Taylor Wimpey UK Ltd, Autograph Homes)**	Strategic gaps are relevant and should be included in this policy, because the policy concerns the landscape and townscapes of North Somerset, and strategic gaps play a role in helping to maintain the landscape setting of settlements.
Whilst we welcome the specific reference to the establishment and delivery of North Somerset Nature Parks in this policy, we strongly recommend that the Definition of Nature Parks includes reference to the fact that a key feature of Nature Parks will be grazing, preferably using cattle. We also recommend reference to a clear vision for Nature Parks, perhaps through use of a Case Study or Studies to inform the evidence base. Nature Parks can provide multiple ecosystem services, but their primary purpose will be to protect, enhance and connect Horseshoe bat habitat. **(Natural England)**	SP11 is a strategic policy, setting out broad expectations of development proposals which more detailed locational and development management policies elaborate upon, such as DP35 on Nature conservation. The justification to that policy points to the importance of cattle grazed pastures regarding SAC bats. However, we agree that a proposed change to the definition of Nature Parks in the glossary can emphasise the need for grazing pasture as part of the Nature Parks habitat. The Council's Nature Parks webpage contains useful information on Nature Parks, including their purpose, and includes the following regarding grazing: "*Greater Horseshoe Bats prefer cattle-grazed pasture with patches of deciduous woodland or thick hedgerows. Cattle dung supports beetles that are an*



	essential food source for these bats". The web page also refers to studies to inform the evidence base: "*Locations for Nature Parks should be based on habitat suitability and connectivity".* The website can be updated with further information including case studies in due course.
The policy seeks to 'protect the best and most versatile agricultural land' (BMV land), which extends beyond the NPPF position of recognising the benefits of such land. Large swathes of North Somerset are BMV land, which should be factored into any wider planning balance when making a decision. The policy should be amended from 'protect' to 'have regard to the benefits of' BMV land, to be consistent with national policy. **(Diverse Partnerships Yatton Ltd)**	The NPPF para 187 indicates that policies should recognise the economic and other benefits of BMV land. Protecting such land would be consistent with that, indicating that the Council strongly recognises those benefits.
Concerns that the policy is too long, overly broad and vague, making it difficult for applicants and decision-makers to understand or demonstrate compliance. It is suggested that much of the detail would be better placed in more specific development management or topic-based policies, with clearer and more streamlined wording, in line with the NPPF requirement. The policy is also criticised for adding little value, duplicating matters covered elsewhere in the Plan. Additionally, references to Biodiversity Net Gain are seen as unclear and should explicitly reflect the mandatory 10% requirement and up-to-date national guidance. Overall, some respondents suggest the policy should be significantly revised or deleted entirely. **(Bellway Homes Ltd, Bloor Homes South West, Bloor Homes - North of Pound Lane Nailsea site, House Builders Federation)**	SP11 is a strategic policy, setting out broad expectations of development proposals which more detailed locational and development management policies elaborate upon, such as DP35 on Nature conservation for example, and DP36 on Biodiversity net gain, which provides detail on that, including the 10% minimum requirement. Therefore, it would not be appropriate for SP11 to be more detailed or precise. The NPPF para 20 indicates that **"**strategic policies should set out an overall strategy for the pattern, scale and design quality of places" and can relate to "d) conservation and enhancement of the natural, built and historic environment…".
Concern that Long Ashton stands to lose much of its ecosystem services if the Local Plan is adopted. **(Long Ashton Nature Conservation and Environment Trust)**	Policy SP11 and other policies relating to the natural environment are important in helping ensure that planning applications, including those relating to residential and other land use allocations in the Plan, meet adequate standards and requirements. This will help to reduce adverse impacts on the natural environment.
Concern that the policy is high level whilst also imposing absolute requirements that go beyond national policy around heritage, landscape, trees and BMV. For example, requiring development to	SP11 is a strategic policy, setting out broad expectations of development proposals which more detailed locational and development management policies elaborate upon. Because they are more detailed it is likely to be

'preserve and enhance' heritage assets rather than allowing the level of harm to the significance of the heritage assets to be assessed, followed by an evaluation of whether the level of harm is outweighed by the public benefits arising from the development. SP11 also does this in applying a blanket requirement to protect the best and most versatile agricultural land, rather than requiring its economic and other benefits to be recognised and taken into consideration in determining planning applications. While retention of existing trees is desirable, the policy's wording reads as an absolute expectation, inconsistent with the NPPF's proportionate approach, such as in para 136. Suggestion to remove SP11 and instead rely on the subsequent development management policies, removing duplication, and to be consistent with the Framework which states that 'Strategic policies should not extend to detailed matters that are more appropriately dealt with through … other non-strategic policies' (paragraph 21). Deletion will also avoid duplication or confusion once the National Development Management Policies are published. **(Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group)**	the latter which warrant closer consideration on matters like degree of compliance with national guidance. The NPPF para 20 indicates that **"**strategic policies should set out an overall strategy for the pattern, scale and design quality of places" and can relate to "d) conservation and enhancement of the natural, built and historic environment…….". It is accepted that National Development Management Policies are intended to be published, however at the point of submitting the local plan for examination they have not been.
Support for the overarching principles of Policy SP11 to protect and enhance the historic and natural environment, but the plan should go further to protect them. The words "where appropriate" should be replaced with "where applicable" to avoid any misinterpretation of the policy intention and ensure development proposals comply with all relevant aspects of the policy. Policy SP11 could not reasonably be met through development of allocations at Nailsea and Backwell with inevitable loss of BMV agricultural land.The policy includes an expectation to support establishment and delivery of Nature Parks but no details are given of their required extent, nature or location, and how they would be delivered and secured in perpetuity. The policy makes no provision for safeguarding dark skies or protecting Nature Parks or bat habitat/green corridors from light spill. It should require development proposals to include sufficient measures referenced within the local plan. The policy should cross-reference to	SP11 is a strategic policy setting out broad expectations of development proposals which more detailed locational and development management policies elaborate upon, such as DP35 on Nature conservation. Therefore, it would not be appropriate for SP11 to be more detailed or precise. There is no need for cross references to such policies to be cross-referenced in SP11. The plan is meant to be read as a whole. DP35 and other policies refer to Nature Parks, such as individual policies for the strategic development locations (LP1 on Wolvershill, LP2 on Woodspring, LP3 on Nailsea and Backwell). The Council's Nature Parks webpage contains useful information on Nature Parks, indicating that "*locations for Nature Parks should be based on habitat suitability and connectivity. This has been modelled for North Somerset Council through extensive research including tracking bat*

an enhanced Policy DP35 to ensure effective delivery of Nature Parks, and include additional provisions to safeguard dark skies and Nature Parks against light-spill. **(Backwell PC Nailsea TC Flax Bourton PC Brockley PC Backwell RA Nailsea Action Group)**	*movements (please see Geckoella's paper for more information)*". Policy DP38 on Landscape requires that where outdoor lighting is proposed, adoption of "a lighting scheme which minimises obtrusive light, particularly where dark skies are an important feature of the area".
Support/Other Comments:	**North Somerset Council Officer Response:**
The policy seeks to 'protect the best and most versatile agricultural land' and this objective is supported as consistent with national planning policy, though it would not be reasonable or appropriate to go beyond this in terms of unduly restricting development in areas of higher agricultural quality. **(Strongvox Ltd, Stephanie Fowler, Taylor Wimpey UK Ltd, Autograph Homes)**	Comment noted.
We support the broad aims and aspirations of this draft policy. **(Bloor Homes South West) (Bloor Homes (North of Pound Lane Nailsea site)**	Support welcomed.
Agree with policy; but no mention or link to DP9 or SP2. **(Environment Agency)**	Comment noted. The plan should be read as a whole and as such it is not necessary to cross reference to all policies.
Support the overarching principles of Policy SP11 to protect and enhance the historic and natural environment. Also, the expectation to protect the best and most versatile (BMV) agricultural land. **(Backwell PC Nailsea TC Flax Bourton PC Brockley PC Backwell RA Nailsea Action Group)**	Comment noted.



Suggested modifications:
Strategic Gaps should be omitted from the policy as it unduly conflates specific characteristics with spatial planning initiatives **(Strongvox Ltd, Taylor Wimpey)** Definition of Nature Parks should include reference to the fact that a key feature will be grazing, preferably using cattle. We also recommend reference to a clear vision for Nature Parks, perhaps through use of a Case Study or Studies to inform the evidence base. **(Natural England)** The policy should be amended from 'protect' to "have regard to the benefits of" BMV land, to be consistent with national policy. (**Diverse Partnerships Yatton Ltd**) Delete this policy, in accordance with Paragraph 21 and 16(f) of the NPPF. Emphasise this message in supporting text or the Vision section. **(Bellway Homes Ltd)** Some of the detail may be best refined and streamlined to be less generic. Alternatively, some of the lengthy wording may be better captured as accompanying paragraphs to support the policy itself. **(Bloor Homes South West)** If the policy is retained, to satisfy NPPF para 35, the policy wording should be revised in line with the Framework. An alternative we prefer is to remove SP11, instead relying on the subsequent development management policies, removing duplication, and to be consistent with the Framework. **(Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group)**



SP12: Minerals

Policy SP12 Minerals	
Number of representations received: 8	
Number of objections based on policy being unsound: 0	
Not positively prepared: 0 Not justified: 0 Not effective: 0 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Durnford Quarry causes many problems to locals. It may no longer be a quarry but it recycles aggregates, which is good, but substantially increased traffic to the quarry. Mud on wheels of vehicles is dumped on Clerken Combe and splattered on road signs and cats eyes. The quarry could avoid this by keeping visiting vehicles separate from those working on the quarry, but not done as complicated for the quarry and more expensive. This will cause an accident (if not already). This quarry needs to be included in the plan. **(DA Wheeler)**	Reference is made to Durnford Quarry in the justification to Policy SP12. Issues such as environmental pollution or harm to living conditions, health or safety which could arise from proposed developments, including the sorts of uses in place at the quarry, are covered by Policy DP13 of the emerging Local Plan.
The reference to recycled aggregates implies that it forms part of the maintenance of the steady and adequate supply of aggregates, which in the Company's view is contrary to paragraph 226 of NPPF. Suggest second part of policy be amended to: *The council will plan for a steady and adequate supply of aggregates, by seeking to maintain a land bank for crushed rock of at least 10 years, and allocating areas for mineral working where necessary, having regard to the need to promote deliverability of permitted reserves of crushed rock. It will also seek to encourage the provision of facilities for the*	Para 226 of the NPPF which refers to planning for a steady and adequate supply of aggregates includes some reference to recycled aggregate in its criterion a). The policy is listing things relevant to planning for a steady and adequate supply of aggregates, not placing them in any order of importance, so no change is necessary.



production of recycled aggregate. **(Breedon Group)**	
Support/Other Comments:	**North Somerset Council Officer Response:**
Support policy. **(Tarmac Trading)**	Support welcome.
The Company supports the policy commitment to a steady and adequate supply of aggregates, and seeking to maintain a land bank for crushed rock of at least 10 years throughout the Plan period. It also supports the policy to safeguard permitted limestone workings from inappropriate development which could adversely affect mineral production. **(Breedon Group)**	Comment noted.
This policy makes sense, it is important to identify and protect possible mining sites, and that existing sites are worked, as they provide much needed employment. **(R Storrar)**	Comment noted.
A minerals safeguarding area is identified north of Nempnett Thrubwell. The policy's approach appears to be reasonable and justified. Given the proximity to the shared boundary B&NES would request further dialogue and engagement on the approach to minerals working, including on relevant planning applications. **(Bath and North East Somerset Council)**	Comment noted. The Plan's approach to mineral working is set out in relevant policies such as LP16, LP17, LP18, DP30 and DP31. The policy on the Minerals Safeguarding Area is LP18. The council has agreed a statement of common ground with B&NES which covers this issue and will continue to engage with B&NES regarding minerals working.
Agree with policy, but no mention or link to DP9 or SP2. **(Environment Agency)**	Comment noted. The Plan is meant to be read as a whole, and all relevant policies are likely to be considered in determining planning applications. Many policies inter-relate, and it would be make the Plan inappropriately long to mention all the links.
Suggested modifications:	
Amend second part of policy to read: *The council will plan for a steady and adequate supply of aggregates, by seeking to maintain a land bank for crushed rock of at least 10 years, and allocating areas for mineral working where necessary, having regard to the need to promote deliverability of permitted reserves of crushed rock. It will also seek to encourage the provision of facilities for the production of recycled aggregate.* **(Breedon Group).**	



Durnford quarry needs to be included in the plan.
(DA Wheeler)



SP13: Waste

Policy SP13 Waste	
Number of representations received: 6	
Number of objections based on policy being unsound: 1	
Not positively prepared: Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Comment raising concerns with North Somerset Councils waste collection service and recycling centres. **(Rich Coleman)**	These comments relate mainly to day-to-day management of household waste rather than Policy SP13, but are noted.
Support/Other Comments:	**North Somerset Council Officer Response:**
Agree with policy, but no mention or link to DP9 or SP2 **(Environment Agency)**	Noted. The Plan is meant to be read as a whole, and all relevant policies are likely to be considered in determining planning applications. Many policies inter-relate, and it would be make the Plan inappropriately long to mention all the links.
The management of waste is a vital requirement, to ensure that recycling opportunities are maximised and landfill kept to a minimum. **(R Storrar)**	Noted.
Suggested modifications:	
None	

Locational Policies

LP1: Strategic Location: Wolvershill (north of Banwell)

Policy LP1: Wolvershill Strategic Location	
Number of representations received: 16	
Number of objections based on policy being unsound: 9	
Not positively prepared: 4 Not justified: 6 Not effective: 6 Not consistent with national policy: 6	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 3	
Main Issues Raised:	**North Somerset Council Officer Response:**
Policy LP1 states that "a single masterplan covering the entire allocation and proposed development, delivery plan and supporting design codes will be prepared to guide its coordinated and comprehensive development and the creation of a sustainable community." However, outline planning applications have been submitted ahead of any development delivery plan and the formulation of a single masterplan, which brings into question the effectiveness of this requirement of the policy and raises questions about the timescales required to secure detailed planning permissions. **(Wain Homes)**	Whilst officers are assessing the planning applications, the fundamental requirement for a single masterplan and comprehensive delivery plan remains, and is a critical part of the policy. Officers will be assessing application materials, including recent revisions, to consider the extent to which these requirements are being fulfilled.
It is noted that there is only limited reference to a Wolvershill Masterplanning Framework SPD. Given the size of the strategic location and the variety of landowners and developers who are involved, it is considered that an SPD will be important to setting an objective position regarding the detail of the principles that the	The Government has published the Levelling-up and Regeneration Act 2023 (Commencement No.11 and Saving and Transitional Provisions) Regulations 2026. Regulation 6(2) states that 'On and after the commencement date (25 March 2026), an authority may continue to prepare and make arrangements for the adoption of a proposed

development should deliver. Welcome and support the commitment to produce an SPD to guide delivery of the proposals, but consider that the policy should provide a clearer commitment to its production. **(Bellway Homes, St Phillips)**	Supplementary Planning Document (SPD), provided that the document is adopted no later than 30th June 2026'. Given this timetable, an SPD is now not available as a route because the local plan itself would not be adopted before this time and an SPD could not be adopted before the local plan establishes the principle. Officers are considering the most appropriate vehicle for the provision of any additional planning guidance in a timely way if required.
Overall development housing supply – queries over whether the capacity for 3,300 dwellings can be delivered at the Wolvershill Strategic Location and within the plan period to 2041. **(Bloor Homes South West - Wolvershill, Wain Estates, Wain Homes)**	Officers consider there is sufficient capacity to accommodate around 3,300 new homes at the Wolvershill Strategic Location. As set out in the Housing Topic Paper, and in line with the three five-year timeframes cited in the NPPF, we are expecting 350 dwellings within years 1-5 of the plan period (deliverable supply), 1,350 within years 6-10 (developable supply) and the rest in years 11-15. There is always going to be some level of uncertainty as to the build out of any strategic development site as this is very much subject to market conditions and other factors.
Support the policy allocating the strategic location for 3,300 new homes, however express concerns that the wording of the policy states that the allocation will deliver "up to 3,300" new homes. Given the size and diverse range of uses proposed for the site and also given that the policy makes clear that there will be further masterplanning work required to develop the detail of the proposals, limiting the number of new homes to no more than 3,300 dwellings would seem to be an inflexible approach. **(St Phillips)**	Policy LP1 does refer to "around 3,300". It is not expected feasible that the site would yield significantly in excess of 3,300 homes. Also, if proposals were to come forward and it did increase above 3,300, provided this supports the wider requirements of the policy and all other material planning issues, there would not be an in-principle objection to any increase.
Suggestions to reframe the affordable housing requirements for Policy LP1 based on a percentage figure, in line with any final figure set by Policy DP43 for all greenfield sites, or a bespoke rate for the Policy LP1 allocation based on final viability testing (accounting fully for all policy requirements). **(Bloor Homes South West - Wolvershill, Wain Estates)**	Whilst the policy highlights the scale of affordable housing provision based upon the 3,300 homes proposed, ultimately Policy DP43 requires "30% on greenfield sites". If the overall scale of the development is different, the affordable provision will vary accordingly.
Request to identify specific locations of M5 crossing points	The fifth bullet point of the policy refers to "three M5 crossing points (two



referenced in policy text on a supporting plan or diagram to improve clarity. **(Bloor Homes South West - Wolvershill)**	road bridges and a direct cycle/pedestrian access into Parklands Village)". The IDP identifies the required transport upgrade schemes to facilitate this development including: • **TR32**: Active Travel route between development and Locking Parklands via Summer Lane and M5 Accommodation Bridge. • **TR38**: Wolvershill Road/Churchlands Way, Weston-super-Mare - scheme to optimise the highway for active travel facilitating trips from Wolvershill to Weston-super-Mare, including Parklands The third crossing point is the A371 that is currently receiving upgrades as part of the Banwell Bypass work.
Healthcare requirements - request from a developer to clarify and confirm specific requirements for healthcare facilities within the development or as off-site contributions, with costs fully accounted for as part of viability assessment. BNSSG ICB comment that health infrastructure capacity will need to be significantly increased to support the demand from the proposed Wolvershill allocation in Banwell and neighbouring Weston-super-Mare. BNSSG ICB generally supports the inclusion of the policy wording as drafted, as it provides a degree of certainty that healthcare requirements will be met either on- or off-site. They are however concerned that the policy only makes reference to securing "land provision" on-site. **(Bloor Homes South West - Wolvershill, BNSSG ICB)**	The Local Plan cross-refers to the Infrastructure Delivery Plan and the specific requirements are set out there, including costs and expected contributions. The overall contributions package will take into account viability considerations. The Council have engaged with the Integrated Care Board throughout the preparation of the local plan, the supporting Infrastructure Delivery Plan, and live planning applications at Wolvershill and a Statement of Common Ground has been prepared ahead of the local plan examination. The policy wording regarding health provision is proposed to be slightly amended, and is supplemented with more specific requirements set out in the IDP.
Approach to Nature Parks is queried, with request to clarify expectations and requirements for the North Somerset Nature Park in terms of how the Council expects this to be delivered, and how it is to managed and maintained. **(Bloor Homes South West - Wolvershill, Wain Estates)**	There are numerous references to Nature Parks throughout the Local Plan including DP35, and the justification to Policy SP11 on Historic and natural environment, (both of which refer to developer-led Nature Parks at the Wolvershill, Woodspring and Nailsea and Backwell strategic locations). Also, they are referenced in the individual policies for those strategic development locations (LP1 on Wolvershill, LP2 on Woodspring, LP3 on Nailsea and Backwell). The Council's Nature Parks webpage contains useful information on



	Nature Parks, indicating that there are three main types: -developer-led, located at strategic sites provided by developers -Council-led – managed on North Somerset Council-owned land, and -charity or private – created and managed by landowners or conservation groups. For the first type it will be up to developers to propose the precise location and scale of Nature Parks for their strategic developments, such as for Wolvershill and Woodspring for example, when preparing planning applications, and to seek feedback from the Council.
Requests for policy amendments to remove or amend the following elements: • remove the requirement for "A strategy to support and maximise climate change resilience….." – these aspects are adequately covered by other policies within the plan. • remove requirement for "Defined areas of green infrastructure should be planted with wildflower species within a wider natural landscape setting". • remove or amend the requirement for treatment of historic farmsteads, to ensure that this requirement is clearly stated and aligns with other policies within the plan on heritage assets and placemaking principles; • request amendment to policy wording dealing with heritage and archaeology; • remove requirement that "Rainwater should be treated as a resource and proposals should maximise its reuse"; **(Bloor Homes South West - Wolvershill, Wain Estates)**	Disagree. These are justified components of the policy, giving specific focus on the need to address climate issues, landscape, sensitive heritage assets.
Request for justification for all recreation provision to be sought via Policy LP1, including specifically the requirement for outdoor tennis courts; **(Bloor Homes South West - Wolvershill, Wain Estates)**	Tennis Courts are identified as a requirement for this development, in addition to a range of other facilitates, in consultation with the Council's leisure officers, and set out in Policy LP1 and the IDP.
Query regarding the required amount of primary school provision for	Following discussions through the ongoing live planning applications it is



this development. **(Bloor Homes South West - Wolvershill, Wain Estates, St Phillips)**	agreed that the anticipated pupil yield from this development is capable of being accommodated within two primary schools rather than three. A proposed change is recommended to address this.
Objection to the inclusion of Gypsy and traveller provision within the policy from Bloor Homes. Request to remove requirement for gypsy and traveller provision (or contributions) from with Policy LP1, in line with comments made on Policy DP44. Wain Estates accepts that financial contributions for Gypsy and Traveller pitches are required, however, the Policy should be amended to require financial contributions only as there is no scope within the allocation to provide these. St Philips state that It is unclear how these pitches are to be delivered. If they are to be within the site, the SPD should suggest locational requirements and the Masterplan should set out where they may be provided. If off-site, the SPD should set out how these pitches will be delivered and what contributions are needed. **(Bloor, Wain Estates, St Philips)**	It is considered reasonable and justified to require provision of a site(s) within the strategic location, however the policy allows some flexibility for offsite provision if this is demonstrated to not be feasible. It has not been demonstrated that there is no scope to provide these within the allocation.
The policy sets out the need for full masterplans prior to the making of any applications. It is noted that Strategic Location LP1 is already subject to 3 live applications, and it remains unclear whether the policy will in effect require withdrawal of these. **(Diverse Partnerships Yatton Ltd)**	Applications currently submitted at Wolvershill still need to be supported by a single masterplan and other prerequisites before any determination can take place. Work is underway with developers and land promoters on this, informed by the range of other factors that will influence the masterplan.Usual statutory procedures apply to planning applications submitted at any time, including whilst the new local plan is still emerging.
Serious concerns that the Banwell Bypass, which the Council identifies as the essential gateway infrastructure to enable the Wolvershill strategic allocation, lacks a credible and evidenced delivery programme. The updated Stage 7 Transport Assessment continues to treat the Bypass as a committed scheme, yet provides no confirmed construction timetable, no funding certainty beyond the headline HIF allocation, and no risk assessment demonstrating that the scheme can be delivered early in the plan period. **(Harrow Estates)**	The Banwell Bypass is fully funded and well under construction, proposed for completion in 2027. This is a major infrastructure project, that demonstrates the Council's ability to deliver large-scale infrastructure projects with Government support via grant funding.
There are viability challenges at Wolvershill. The Infrastructure Delivery Plan published in October 2025 lists high levels of	Evidence prepared by Dixon Searle indicated generally weaker viability for Wolvershill compared to other proposed Strategic Locations driven in large



infrastructure investment required. The Additional Sites Viability Addendum also published in October 2025, concludes that viability is challenging on the site and it does not provide evidence that the 30% affordable housing requirement of LP1 will be deliverable. The range of transport mitigations identified should also be subject to viability assessment. **(Wain Estates, Harrow Estates)**	part by anticipated sales values. However, the report offers a caveat that viability is high-level and captures a snap-shop in time – viability prospects over the build-out of a strategic sites can change influenced by wider market conditions. There are also mechanisms in the local plan to respond to challenging viability at the planning application e.g. potential for reduced affordable housing if justified. Policy DP54 *Affordable housing* reads: "If [the affordable housing] requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored." The viability evidence indicates reasonable potential to support the 30% affordable housing requirement as set out in Policy LP1, and this has again been reviewed in light of recent updates to the IDP infrastructure requirements.
Policy LP1 is not consistent with national policy in respect of the Mendip Hills National Landscape. There may be a need for s106 planning obligations and/or CIL monies to address off-site recreational pressures within the National Landscape, resulting from new development within or near the designated area. Modification suggested to Policy LP1: Insert the following text at the end of Bullet Point 7: The development must respect the landscape setting, including minimising any adverse impact on the Mendip Hills National Landscape through sensitive design, landscaping and contributions to off-site nature recovery and improvements to key recreational routes and destinations. **(Ian Bowen)**	There is no need for the suggested addition to the policy requiring development contributions to mitigate harm to the existing recreational network as a result of increased pressures associated with new development. Other policies cover this such as SP11, DP15 and DP63.
Work is ongoing to demonstrate the impacts of the proposed development on the Strategic Road Network. As part of the application process (three outline applications are submitted), National Highways is in discussions with landowners regarding the required scope of improvements to the accommodation bridge over the M5. It is welcome that the policy refers to effective management	Comments noted, and officers are continuing to have ongoing engagement with National Highways on this development and the Local Plan generally, as agreed through a Statement of Common Ground. There is proposed wording in the Local Plan that relates to upgrades to Junctions 19, 20, and 21 on the Strategic Road Network, and these requirements are translated into the IDP.



and treatment of surface water, noise mitigation requirements, and landscaping adjacent to the M5 motorway. Given the location of the site alongside the motorway, environmental impacts of the proposed development and the motorway itself will require careful attention. Whilst it is considered that the policy wording appropriately highlights the requirements for the site, National Highways will continue to explore these matters with landowners as part of the live applications for the site. The policy requires provision of a package of transport measures as identified in the Infrastructure Delivery Plan (IDP). It is noted Policy LP1 does not link the Wolvershill development to the M5 J21 Bypass Scheme referred to in Schedule 7 of the Pre-Submission Plan. The Bypass Scheme is shown on the Policies Map and could connect Wolvershill Road and the A370 to the east of the M5. Such a link could impact on future use of Wolvershill Road and associated active travel provision, and further discussion on this proposal would be welcomed by National Highways. **(National Highways)**	On the J21 Relief Road, land to facilitate this scheme in future is proposed to be safeguarded in the Local Plan in the event it is necessary, and the scheme features in the IDP although is assigned a lower priority category. Progression of any further work on this scheme would include engagement with National Highways given the proximity and relationship to the M5.
The policy includes a requirement that the development should not preclude any future planning and delivery of a new motorway junction on the M5 south of J21. National Highways is aware of the aspiration locally for a new motorway junction to the east of Weston-super-Mare but note this does not currently feature in any National Highways delivery programme. We understand that North Somerset Council is looking to future-proof a potential location that may be required to underpin growth beyond the plan period. It will be important to ensure that any option for a new motorway junction has due regard for the safety and operational integrity of the M5. **(National Highways)**	Comments noted. Any further work on this scheme would include engagement with National Highways and require their support.
Observation that the Council's evidence base does not clearly justify the requirement for a new motorway junction on the M5 south of J21 and it is noted that National Highways has not requested that one is planned for and delivered now or in the future. For these reasons, whilst there is no objection to this element of the policy in principle,	Comments noted.

we would object to future planning for a new motorway junction at this location if it precludes the planning and delivery of the other requirements of draft Policy LP1, particularly for the required housing and employment. **(Wain Estates)**	
The applicant has not demonstrated any robust evidence of local housing need that would justify a development of this scale or type in this specific location, and there is weak demand for local housing. **(Paul Goddard)**	Housing needs are identified for the North Somerset area generally, and this is a sustainable location to deliver a strategic amount of housing, well related to the Weston-super-Mare urban area, in accordance with the spatial strategy. Housing demand is influenced by a range of interrelated factors, but there is no indication that the delivery of the development would ultimately be hindered by weak demand.
Failure to demonstrate “exceptional circumstances” for former Green Belt release. **(Paul Goddard)**	This location has never been identified as Green Belt land and so the specific policy requirements associated with this designation do not apply.
There seem to be several criteria, all of which deal with transport related matters in some detail. For example, criteria 5, 6, 10, and 12 all deal with the transport details of the proposals and there seems to be repetition of points regarding safe walking and cycling routes, and access to Weston-super-Mare and Worle for facilities and strategic transport. The policy could be simplified if these criteria could be combined into one or two criteria which together set out a clear vision for transport and movement. **(St Phillips)**	These transport details are spread across the policy but deal with different aspects.
There is no objection in principle to the emphasis on medium and high density, however there are concerns that the precise housing mix on the site and the densities to be achieved should be driven by the housing mix that is needed and detailed masterplanning of the site. Density expectations should be clarified. **(St Phillips, Bloor Homes South West - Wolvershill , Wain Estates)**	Policy DP8 *Efficient use of land* sets out a requirement for a minimum of 40 dwellings per hectare, but that this should be higher at accessible locations. In the context of Wolvershill, 40 is a minimum expectation overall but increased density around the local centre and other accessible locations should be investigated through masterplanning and this is evident through planning application submissions.
The plan clearly sets out a range of detailed development management policies which set out requirements for all development to comply with across the District. For example, Policies DP5 and	In general terms, the local plan should be read as a whole and it is not considered appropriate to specify in LP1 the range of other policies in the plan that may apply as this would be very much dependant on the



DP6 set out detailed guidance on climate adaptation and net zero development. It would be helpful if Policy LP1 could set out the general development management policies which also apply to the delivery of the strategic location. **(St Phillips)**	proposal.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support principle and allocation of growth at this location. **(Ainscough Strategic Land, Bellway, Bloor Homes South West - Wolvershill , R Storrar, St Phillips, Wain Estates, Wain Homes)**	Support noted and welcomed.
Support requirement for gypsy and traveller provision. **(Environment Agency)**	Noted.
Support reduction to 30% AH from 38.5% in previous iteration of the plan. **(Wain Estates)**	Noted.
The three main land promoters Wain Estates, Ainscough Strategic Land and Bloor Homes South West have, and are continuing to work together to prepare a single comprehensive masterplan for the strategic location, recognising that there are additional landowners within the strategic location who have also expressed an interest in bringing their land forward for development. The consortium and other land owners and promoters are engaging with the Council in this respect. The detail on what the masterplan should cover is welcomed in principle. **(Wain Estates, St Phillips)**	Noted, and the collaborative approach to masterplanning is welcomed and supported.
Suggested modifications:	
***Ainscough Strategic Land**, **Bloor Homes South West - Wolvershill** and **Wain Estates** form a Consortium at the Wolvershill Strategic Location and are working collaboratively to bring forward proposals. They have provided proposed policy revisions in their representations – see representations for full proposed policy change.* Summary of **Bloor Homes South West - Wolvershill** change requests:	



- Confirm and clarify the capacity for 3,300 dwellings to be delivered at the Wolvershill Strategic Location and within the plan period to 2041;
- Reframe the affordable housing requirements for Policy LP1 based on a percentage figure, in line with any final figure set by Policy DP43 for all greenfield sites, or a bespoke rate for the Policy LP1 allocation based on final viability testing (accounting fully for all policy requirements);
- Identify specific locations of M5 crossing points referenced in policy text on a supporting plan or diagram to improve clarity;
- Clarify and confirm specific requirements for healthcare facilities within the development or as off-site contributions, with costs fully accounted for as part of viability assessment;
- Clarify density expectations for Strategic Location with reference to terms “medium” and “high” density used within the strategic location policy;
- Clarify expectations and requirements for the North Somerset Nature Park in terms of how the Council expects this to be delivered, and how it is to managed and maintained;
- Remove the requirement for “A strategy to support and maximise climate change resilience will be required including an approach to maximising carbon storage and other measures across the development with exploration of opportunities for community-based renewable energy generation” – these aspects are adequately covered by other policies within the plan;
- Remove requirement for “Defined areas of green infrastructure should be planted with wildflower species within a wider natural landscape setting”;
- Remove or amend the requirement for treatment of historic farmsteads, to ensure that this requirement is clearly stated and aligns with other policies within the plan on heritage assets and placemaking principles;
- Remove requirement that “Rainwater should be treated as a resource and proposals should maximise its reuse”;
- Clarify justification for all recreation provision to be sought via Policy LP1, including specifically the requirement for outdoor tennis courts;
- Reflect amendments required to clarify provision to be made for the effective delivery of Primary Education places with the development; and
- Remove requirement for gypsy and traveller provision (or contributions) from with Policy LP1, in line with comments made on Policy DP44.

For **Wain Estates**, a suggested revised policy is shown on pages 17 to 20 of their representation including most of the above points in addition to others.

For **Ainscough Strategic Land**, a suggested revised policy is shown in Appendix 3 of their representation including most of the above points also in addition to others.

More detail is required about the allocated housing sites to demonstrate their feasibility, desirability and consistency with other planning policies– in the form of a development brief.



(Burrington Parish Council)

Insert the following text at the end of Bullet Point 7: The development must respect the landscape setting, including minimising any adverse impact on the Mendip Hills National Landscape through sensitive design, **landscaping and contributions to off-site nature recovery and improvements to key recreational routes and destinations.**
(Ian Bowen)

Replace the struck out text:
~~Subject to confirming needs generated by the development, the development must ensure suitable land provision is made available to facilitate the provision of appropriate healthcare infrastructure onsite or appropriate financial contributions towards healthcare for new and/or improved facilities off-site;~~

Replace with:

Development will ensure the provision of appropriate primary care infrastructure on-site or through appropriate financial contributions towards primary care for new and/or improved facilities off-site to support new development. On-site healthcare provision should be provided as a turnkey, fully fitted out facility (ready for occupation) constructed at developer cost to NHS specification provided leased at a peppercorn rent for the entirety of occupation.
BNSSG ICB

Housing should instead be directed to central WsM to avoid Green Belt land on outskirts.
(Paul Goddard)



LP2: Strategic Location: Woodspring (south west of Bristol)

Policy LP2: Strategic Location: Woodspring	
Number of representations received: 34	
Number of objections based on policy being unsound: 10	
Not positively prepared: 7 Not justified: 7 Not effective: 7 Not consistent with national policy: 3	
Number of objections based on policy being not legally compliant: 2	
Number of objections based on policy being not compliant with Duty to Co-operate: 5	
Main Issues Raised:	**North Somerset Council Officer Response:**
The requirement for a comprehensive masterplan could delay application submissions and ultimately delivery of this site. North Somerset Council should be responsible for producing an overarching masterplan or SPD, rather than the developers. Differing reasons were given for this, for example to ensure that green spaces and wildlife corridors can be best protected and enhanced, or to cover the potential eventuality that agreement cannot be reached between the developers. Suggestions from the Long Ashton Green Belt Working Party regarding masterplanning principles, an SPD and design briefs. **(Long Ashton Green Belt Working Party, Long Ashton Nature Conservation and Environment Trust, Diverse Partnerships Yatton Ltd, Taylor Wimpey, The James Family)**	Disagree. There is no reason for this to impede delivery. As drafted the policy requires all developers and/or promoters with a commercial interest in the land to agree a comprehensive masterplan with the Local Planning Authority. We consider this provides adequate control for the council. Significant positive work has taken place on this since the site was identified in the Additional Sites Consultation early in 2025, with joint workshops between the parties having taken place, and discussions ongoing. Council officers have also engaged with the Green Belt Working Party and value the inputs from the community, which will help shape the development.
Objection to the quantum of employment land being prescribed. **(Taylor Wimpey)**	We acknowledge that in order to achieve the indicative housing capacity of around 3,500 homes on this site, as well as all of the required infrastructure, that the quantum of employment proposed may need to be reduced. As such we are proposing a change to the plan, to be considered through the examination process.
Viability concerns, with particular regard to affordable housing.	The representation states that no alternative wording is proposed, but the

(Taylor Wimpey)	future planning application will be supported by detailed considerations of the development viability. Policy LP2 cross refers to Policy DP43: Affordable Housing, therefore no amendment is required to address this concern.
Objection to specifying the number of schools in the policy, preferring a needs based, flexible approach, and one that also permits community agreements for school sports facilities. **(Taylor Wimpey)**	We accept that the policy as drafted could be considered too prescriptive in terms of education requirements and as such are proposing a change to the plan, to be considered through the examination process. In addition, we are supportive of the proposed inclusion of wording that provides a clear expectation for the playing pitch provision to be delivered as part of the secondary school site and operate under a community use agreement.
Objection to the requirement for 18 pitches for Gypsy and Traveller accommodation on-site, arguing the need is better met at existing sites and that alternative locations have not been properly assessed. **(Taylor Wimpey)**	Disagree. The council's position is as set out in the Gypsy and Traveller background paper.
Insufficient evidence of deliverability has been provided for this strategic location and queries over whether 3,500 homes can be delivered if using assumptions from the 'Start to Finish' work. **(Wain Homes, Harrow Estates)**	Discussions are ongoing with the two landowners covered by this allocation. Neither party objects to the quantum of development proposed in this location over the plan period.
Concern that the Historic Environment Assessment (HEA) does not provide any mitigations against significant adverse impact on designated heritage assets on a particular part of the site south of the A38 and suggestion that the boundary therefore be amended. (**Historic England)**	The mitigations and opportunities for enhancement identified in the HEA are in response to consideration of the site allocation as a whole. The masterplanning will need to address the most sensitive parts of the site accordingly. The Council will engage further with Historic England to discuss their concerns, and this matter will be addressed through a statement of common ground.
Concerns regarding conflict between the policy wording and the NPPF in respect of heritage. **(Taylor Wimpey)**	The effect of the proposed development on heritage assets is a matter to be considered through the masterplanning and subsequent planning applications, in a proportionate way, and having regard to the HEA.
Comment regarding a limited part of this strategic location – the area of land east of Colliters Way/north of the A38 Bridgwater Road. Bristol City Council maintains the position that this area should remain a largely undeveloped and green area in the Green Belt. The	It is considered that the development principles set out in the policy are sufficient to overcome these concerns.

adjacent land in Bristol is in the Green Belt and is proposed to remain as Green Belt in the well advanced emerging Bristol Local Plan. This land is also a Site of Nature Conservation Interest (SNCI). It is acknowledged that the 'Green Infrastructure and Landscape' development principles for Policy LP2 state that 'development must retain and enhance strategic green buffers to maintain visual separation from Bristol'; however, the boundary for LP2 as shown on the Policies Map does not enable the degree of continued separation from Bristol which would be assured by retaining the land in the Green Belt. **(Bristol City Council)**	
The policy should make clear that, as part of the Nature Park requirement, the development will need to include a generous woodland buffer at the extreme western edge of the site. **(Natural England)**	The council consider the policy to provide an appropriate level of detail at this stage. Indicative arrangements will be set out in the masterplan, with firm details to be agreed with Natural England through planning applications.
Concern that this development will create a significant population uplift that could cause significant pressures on local primary care facilities. Request for modifications to the policy, and for the council to engage with the BNSSG ICB on this proposal. **(BNSSG ICB)**	Concerns noted, although the policy does already include references to the provision of healthcare facilities. In addition, Policy DP63 will apply to all new developments to ensure the delivery of adequate infrastructure to support new developments, and as such we do not agree that amendments are needed to the policy. North Somerset Council meets regularly with the BNSSG ICB and are working with them to ensure necessary healthcare infrastructure is reflected in the Infrastructure Delivery Plan.
Concerns over the loss of Green Belt land, the golf course in particular, and the impact this development will have, particularly in respect of the transport network, wildlife corridors, climate change and utilities providers. Comments that if the development does go ahead the design should be high quality and the mix of housing should be varied, laid out with good pedestrian and cycle links into Bristol. Suggestions that Yanley Lane should be closed as part of the development proposals. **(D Wheeler, Barrow Gurney Parish Council, N Boswell Brown,**	The justification for the loss of Green Belt is well documented in the supporting evidence base documents, and the impact of this development has been thoroughly considered when drafting this policy. Matters of detail, such as layout, housing mix, or how Yanley Lane will function in future, will be addressed through planning applications.



Andrew Boswell Brown, K Simmons, William Jones, Harvey Lilley, Sarah Le Flohic, Andy Garrett, N Moorcroft, Tina Jennings)	
References to cumulative impact as a result of this development, the nearby Epic Healthcare development and any future growth at Bristol Airport. Strong views that infrastructure must be delivered in advance of any development, and that a mass transit alignment must be identified and confirmed in advance of commencement. Furthermore, construction of the mass transit route should take place in parallel with the development. **(Barrow Gurney Parish Council)**	The Transport Assessment has considered the impacts of development across the whole network. Whilst these concerns are noted it is considered that the policy requirements, that seek to not preclude future delivery of a mass transit scheme, are appropriate and proportionate.
Support/Other Comments:	**North Somerset Council Officer Response:**
Strongly support the overall thrust of Policy LP2, and focussing sustainable growth around the Bristol fringe, although suggest that the plan should include a mechanism to bring forward other land parcels around Woodspring and Barrow Gurney. **(Del Piero)**	Support noted. It is considered that the policy appropriately identifies all of the land that is covered by this policy, which provides certainty for local communities.
There do not appear to be any strategic cross boundary issues arising from this site with B&NES, but welcome further dialogue and consideration of any potential impacts from individual sites or cumulative growth, particularly in respect of the highway network. **(Bath and North East Somerset Council)**	Noted, and agreed. This will be addressed through a statement of common ground.
Bristol City Council acknowledges strategic allocation LP2 at Woodspring (SW Bristol) for the proposed residential capacity of up to 3,500 homes and looks forward to continuing to engage and collaborate with North Somerset Council regarding the development of this location. **(Bristol City Council)**	Noted, and agreed. This will be addressed through a statement of common ground.
Support for the policy identifying the need for the developers to produce a single masterplan and a delivery plan. Further support for approach to flood risk. **(National Highways, Environment Agency, South West Water**	Support welcomed.



Limited)	
General support for the allocation from the landowners as a deliverable and developable strategic location. (**James Durie, Taylor Wimpey)**	Support welcomed.
The policy should not preclude the parcels of land controlled by different parties from being delivered in any particular order or concurrently. **(James Durie)**	The policy wording does not dictate any particular phasing arrangements.
General support that this is a sustainable location for growth. (**R Storrar, B Northover, Nailsea Action Group)**	Noted.
Observation that the plan should reflect the needs of the local community and the environment. (**Cllr Mike Dunn)**	Noted. Initial engagement has taken place with local residents, both formally and informally throughout the plan making process. There will be further opportunities to engage through the planning application in due course.

Suggested modifications:

Suggested changes:

Policy LP2 (Woodspring): add a clause enabling the local planning authority to approve adjacent, sustainably located residential parcels where (a) they are master planned as part of the Comprehensive development plan; (b) they meet the 'Golden Rules' (including 50% affordable housing); (c) they deliver or fund Nature Park land, active travel links across and strategic flood risk mitigations to Ashton Brook with potential capacity upgrades). This will provide necessary flexibility and early affordable housing delivery aligned with LP2's principles and SP3's spatial strategy.
(Del Piero)

Modification proposed to include supporting text as a fallback position in the event the parties fail to agree a masterplan for the whole allocation before planning applications are submitted.
(James Durie)

Recommend that, due to the importance of conserving the historic environment in an appropriate manner, a portion of the greater site on rising land to the south of the A38 be omitted and other opportunities are considered.
(Historic England)

Detailed wording changes proposed by Taylor Wimpey. These are addressed under the main issues above, and cover masterplanning, quantum

of employment, education facilities, heritage, Gypsy and Traveller accommodation and affordable housing. Please see full representation for suggested wording changes.
(Taylor Wimpey)

Request from the Integrated Care Board for additional wording:
Development will ensure the provision of appropriate primary care infrastructure on-site or through appropriate financial contributions towards primary care for new and/or improved facilities off-site to support new development.
On-site healthcare provision should be provided as a turnkey, fully fitted out facility (ready for occupation) constructed at developer cost to NHS specification provided leased at a peppercorn rent for the entirety of occupation.
(BNSSG ICB)

Request that the policy should stipulate that a mass transit alignment must be identified prior to the commencement of any development. **(Barrow Gurney Parish Council)**



LP3: Strategic Location: Nailsea and Backwell

Policy LP3: Strategic Location: Nailsea and Backwell	
Number of representations received: 145	
Number of objections based on policy being unsound: 111	
Not positively prepared: 68 Not justified: 93 Not effective: 88 Not consistent with national policy: 70	
Number of objections based on policy being not legally compliant: 22	
Number of objections based on policy being not compliant with Duty to Co-operate: 31	
Main Issues Raised:	**North Somerset Council Officer Response:**
Significant concerns regarding scale of growth / overdevelopment (unsustainable, out of character), and Nailsea and Backwell as a Strategic Location in principle. Many concerns raised that the quantum of housing directed to Nailsea/Backwell is disproportionate, especially for the village of Backwell, exceeds local capacity, and would harm character and wellbeing. Arguments are put forward that Nailsea and Backwell is not the most sustainable strategic location; that alternatives (including locations closer to major employment and transport corridors, and/or brownfield/urban areas) should be prioritised; and that LP3 should be deleted or materially reduced and redistributed. **(Adam Bloom; Ann Belcher; Anthony John Cox; Backwell PC; Nailsea TC; Flax Bourton PC; Brockley PC; Backwell Residents Association; Nailsea Action Group; C Welch; Carol48; Cassie and Brian; Cllr B Petty; Guy Stone; Mrs Wendy Derrick; P Parsons; S Scott; Elizabeth Porter; John Moore; Emma Bloom; Graham Scott; Rod Neal; Susan**	As a main town in North Somerset, Nailsea is a focus for development in line with the preferred spatial strategy. Backwell is located close to Nailsea with train station serving both settlements. Nailsea and Backwell were collectively identified as a strategic location early in the preparation of the new local plan with early work assessing development potential in the area via the identification of broad locations/ areas of search. Further detail explaining the approach to the selection of the areas of search is set out in the Strategic Housing Land Availability Assessment (October 2025) under the heading 'Broad Location Templates for the Areas of Search'. The growth directed to the area is informed by capacity opportunities, the need to secure a critical mass of development to support infrastructure provision, and, along with other allocations in the plan, reflects the significant housing challenge facing North Somerset. The alternative locations suggested, such as brownfield sites and the Woodspring area to the south west of Bristol already feature in the plan.

Laver; Dave Mazur; Diane Snape; Jeanne Craske; Oliver Ellis; David Gray; Anthony John Cox; T Crane)	
Concerns that limited local employment will increase commuting to other centres of employment such as Bristol, increasing car dependency and emissions; and that proposed employment land is poorly located or unrealistic. **(Mrs Wendy Derrick; P Parsons; Backwell PC; CPRE, Nailsea TC; Flax Bourton PC; Brockley PC; Backwell Residents Association; Nailsea Action Group; C Welch; Christopher W; Wraxall and Failand PC; Elizabeth Porter; Frances; CPRE; J Haskins; Rod Neal; Kate Wickens; T Crane; Harrow Estates; David Gray; R Bettison)**	Nailsea and Backwell both experience significant out-commuting as do other settlements across North Somerset, due largely to the range and availability of jobs in Bristol. The Sustainability Appraisal identified out-commuting as a key challenge. The local plan proposes new employment development alongside housing to support sustainable growth and offer additional opportunities for local employment and business activity; however some level of out-commuting is expected to remain. Given that, the local plan and wider initiatives seek to improve public transport connections into Bristol to facilitate sustainable travel. This is important because the SA identified that most out-commuting is by private car and so the growth strategy of the new Local Plan should seek to direct development to the more sustainable locations of the district so as to limit the need to travel and support the viability of public transport. (SA, Table 3.1). The majority of the proposed employment land for this strategic location is located close to the train station and A370 offering potential for a commercially attractive opportunity that is also readily accessible.
Concerns that the existing road network (in particular Station Road, A370/Backwell Crossroads, B3130/B3128 and rural lanes) cannot accommodate the level of growth proposed. There is a risk of rat-running, HGV conflicts, safety issues for pedestrians/cyclists/horse riders, and reliance on unproven behaviour change/active travel. This includes concerns around the impact on the wider highway network in and around Tickenham, and routes out of Nailsea in that direction. Concerns that growth will worsen already constrained routes (pinch points, substandard widths, lack of pavements) and create safety and air quality impacts; with requests for funded mitigation and better engagement. **(Adam Bloom; Ann Belcher; C Welch; Cassie and Brian; Christopher Watkins; Cllr B Petty; Mrs Wendy Derrick; P Parsons; Colin Ford; Chris; J Haskins; P Moran; Priscille Lesne; Elizabeth Porter; John Moore; Barry Stirling; Susan**	The Local Plan and its proposed development allocations have been subject to detailed transport assessment and modelling to identify any adverse impacts upon the local road network. This has led to the proposed mitigations in the local plan to support the proposed growth and the particular package of sites that are proposed for allocation. This includes Quiet Lane proposals to address some of the impacts cited, and contributions will be sought towards these measures. The Transport Assessment Appendix E is the Nailsea and Backwell Transport Mitigation Strategy and this provides a package of transport mitigation required to address the cumulative impact of proposed development. These mitigations are translated into the Infrastructure Delivery Plan. As planning applications are submitted each site will also be required to undertake transport assessment of their own development, which may also identify further site specific measures and mitigations that will need to be delivered.



and Paul Triggle; Peter King; Bruce Campbell; D Ellison; Mike Perrott; Denis Sharp; Geoff Lister; James Hobbs; Jeanne Craske; Lynton; M Chamberlain; Oliver Ellis; Rod Neal; S Burrell; Susan Laver; Tickenham PC; Wraxall and Failand PC; Helen Nelson; Nailsea Action Group; Kate Wickens; R Storrar; Tickenham PC; Denis Sharp; J James; A Hinchcliffe; Susan Laver; Geoff Lister; Dave Sowden)	
Significant concerns raised that the strategic rail crossing / Cross Rail Link is unfunded or uncertain, technically complex, may not be delivered in time (or at all), and could mean housing coming forward ahead of critical infrastructure. There are also suggestions that this mitigation will not be effective, and other solutions should be explored/preferred. Some representation seek delivery of this infrastructure before any housing can be supported. In regard to other infrastructure more generally, concerns are raised that major growth is being proposed without credible, secured funding for new school places and primary care capacity; and that reliance on the Council to fund facilities (rather than binding developer obligations) is unrealistic given financial constraints. **(Nailsea Action Group; Paul Moran; Priscille Lesne; John Moore; Backwell PC; Nailsea TC; Flax Bourton PC; Brockley PC; Backwell Residents Association; Miller Homes; Andrew Rowland; Cassie and Brian Allsop; Cllr B Petty; Mrs Wendy Derrick; Anthony John Cox; Bruce Campbell; Denis Sharp; Geoff Lister; Harrow Estates; Historic England; Wraxall and Failand PC; T Crane; Diane Snape; Rod Neal; Dave Mazur; James Hobbs; M Chamberlain; Rubix Strategic Land; Mac Mic Strategic Land, Ellie Britton; Anthony John Cox; James Hobbs; Jeanne Craske; R Bettison)**	It is usual for emerging development within local plans to include infrastructure requirements that are not fully funded at the time of adopting the local plan, indeed it is the obligations associated with new development that provides either part or full funding. Where additional funding is required such as external grant funding, often the allocation of development in the plan and supporting infrastructure provides a basis upon which the council are able to make robust bids for infrastructure funding, as the certainty of development is ensured. The Local Planning Authority is required to demonstrate a reasonable prospect of delivery and through documents such as the Transport Assessment and IDP, a robust strategy for the funding and delivery of infrastructure. Specifically in relation to the Cross Rail Link proposal, the Council are currently preparing a business case including an assumption that grant funding will be sought to fund the majority of the scheme cost. This is on the basis that a funding gap is identified between the total infrastructure package required to support growth and the ability for development to fund this in totality. Proposals for financial contributions as set out in the IDP seek to accumulate a local contribution towards this scheme with the majority balance being provided via grant funding. A proposed change is recommended by the council in regard to phasing of development and delivery of infrastructure, to clarify that development proposals must demonstrate how they support the delivery of the required schemes to mitigate their impacts. The additional wording suggested states:

	"Policy LP3 requires a phasing strategy to be provided with planning applications so applicants can demonstrate a credible strategy for delivery of the required infrastructure identified to support development. This is required to align to the infrastructure details within the Infrastructure Delivery Plan (IDP). The IDP identifies the relevant infrastructure schemes applicable to the Nailsea and Backwell Strategic Location to which development proposals should positively contribute."
Concern that the policy does not address wider increased traffic impacts on surrounding communities along the A370, with a suggestion that the new link road should be restricted to public transport (or otherwise designed to manage induced traffic) to protect village safety. **(Helen Nelson; Flax Bourton PC)**	Transport modelling has assessed the impacts of the Local Plan proposed sites on the transport network and mitigations are proposed accordingly. At the planning application stage for each site site-specific mitigations may also be identified supported by additional transport assessment.
Particular concerns that Nailsea & Backwell railway station is constrained and inaccessible, with limited capacity and facilities, and that the plan relies on the station without a funded upgrade strategy. **(C Welch; CPRE; David Mazur; Diane Snape; Geoff L; Graham Scott; Kate Wickens; Network Rail; P Moran; Robin Stagg; Rod Neal; Susan Laver; T Crane; R Bettison)**	The Local Plan includes proposals to enhance access to the station to address these issues, and in addition to a proposed modification to relocate the station is feasible.
Concerns that many allocations are beyond practical walk/cycle catchments (e.g., 800m guideline), routes are constrained/unsafe, and plan assumptions about mode shift do not account for local topography, severance, and demographics. **(Nailsea Action Group; Kate Wickens; Geoff Lister; Oliver Ellis; Rod Neal; M Chamberlain; J James)**	The Nailsea and Backwell Transport Mitigations Strategy identified active travel routes as a core element of the overall mitigation package. This proposes a network of routes that are required to be delivered.
Concerns that education, GP/healthcare, leisure and other community facilities are insufficient, not site-specific, not costed, and/or not planned to be delivered alongside housing. **(Adam Bloom; Ann Belcher; C Welch; Cassie and Brian Allsop; Colin Ford; Chris; J Haskins; Cllr B Petty; Mrs**	In the preparation of the local plan engagement has been carried out with various service providers to identify the implications of proposed development on service areas and the potential infrastructure requirements. This includes engagement with health services, education, and leisure services.

Wendy Derrick; Nailsea Action Group; P Parsons; P Moran; Priscille Lesne; Elizabeth Porter; John Moore; Anthony John Cox; Ellie Britton; Gill; Graham Scott; I Forsyth; James Hobbs; A Hinchcliffe; R Bettison; Rod Neal; Susan Laver; T Crane; Harrow Estates; Backwell PC; Nailsea TC; Flax Bourton PC; Brockley PC; Backwell Residents Association)	The IDP sets out a range of infrastructure requirements accordingly alongside policy references in the local plan. These are costed schemes in the IDP and will require planning obligations and other funding sources to support their delivery.
Concerns that leisure and community facilities are already stretched/under-invested and that the plan does not secure timely, funded improvements proportionate to growth. **(Cllr B Petty; Gill; Jeanne Craske; Rod Neal; Susan Laver; T Crane; R Bettison; Harrow Estates)**	Policy LP3 requirements improvements to local infrastructure including leisure facilities. This is reinforced through Policy DP63 that addresses infrastructure delivery and development contributions. The supporting IDP includes specific requirements for leisure enhancements in the area including financial contributions towards upgrades to Backwell and Scotch Horn Leisure Centres.
Concerns that Green Belt release is not justified by exceptional circumstances, that it risks coalescence between Nailsea and Backwell and that "replacement" Green Belt elsewhere is not an adequate substitute. **(Anthony John Cox; Avon Wildlife Trust; Backwell PC; Nailsea TC; Flax Bourton PC; Brockley PC; Backwell Residents Association; Nailsea Action Group; Mrs R Watts; Emilia Leung; Jeanne Craske; Diane Snape; Rob Stewart; T Crane; Oliver Ellis; F Parry; Graham Scott)**	Due to the increase in North Somerset's housing requirement through the introduction of the mandatory standard method in the NPPF (Dec 2024) North Somerset cannot sustainably meet its housing requirement on sites outside the Green Belt. This constitutes exceptional circumstances and, in such instances, the NPPF directs local authorities to review their Green Belt boundaries and propose alterations to meet their housing need in full at sustainable locations. As such North Somerset have undertaken a two stage Green Belt review and released land from the Green Belt for housing allocations.
Concerns about loss/fragmentation of habitats and wildlife corridors; impacts on designated sites and protected species (notably horseshoe bats); and whether Nature Park / mitigation proposals are specific and adequate. **(Adam Bloom; Guy Stone; Mrs Wendy Derrick; P Parsons; P Moran; Priscille Lesne; Avon Wildlife Trust; Backwell PC; Nailsea TC; Flax Bourton PC; Brockley PC; Backwell Residents Association; Nailsea Action Group; C Welch; Frances Sheridan; Diane Snape; Graham Scott; Gill; Jessica Houlden; Justina Lewis; Oliver Ellis; R Bettison; T Crane; Rubix Strategic Land, Frances Sheridan)**	Implications of the proposed allocations have been considered through the HRA produced by AECOM to support the Local Plan 2041. For example, referring to the proposed East of Backwell site to which the majority of these comments relate, the HRA reads, *"Given the suitability and connectivity of the allocation, there is the potential to have an adverse impact on functionally linked land for the SAC through removal or disturbance to valuable features."*. The HRA then provides guidance for appropriate mitigation, stating *"Mitigation may be required which could include buffer zones around the boundary features and offsetting, to be submitted as a site mitigation plan prior to any application."* Natural England is satisfied in principle, as set out in the agreed statement of common ground. Ecological impacts will be further explored in detail through



	individual planning applications.
Detailed concerns are raised about the evidence of decline at Brockley Hall Stables (Greater Horseshoe Bat maternity roost), the scale of compensatory habitat required, and that the proposed Nature Park approach is insufficiently specific/strategic (location, contiguity, long-term management, and feasibility of grazing-based habitat) to ensure compliance with habitats legislation. **(Backwell PC; Nailsea TC; Flax Bourton PC; Brockley PC; Backwell Residents Association; Nailsea Action Group; Avon Wildlife Trust; T Crane)**	North Somerset Nature Parks are areas of land maintained to protect and expand the habitats of Greater and Lesser Horseshoe bats. These areas also help maintain wildlife corridors that connect key roosting and feeding area and are agreed as an appropriate mitigation with Natural England. They provide a coordinated and practical way to protect Horseshoe bats while supporting sustainable development and enhancing the wider natural environment. Evidence set out in 'Summary Report of Habitat Evaluation Procedure Calculations' (Oct 2025) sets out, amongst other detail, the likely requirement for on-site and off-site replacement foraging habitat as mitigation for the proposed allocations in the local plan, including those at Nailsea and Backwell.
Significant concerns about loss of high-quality agricultural land (Grades 1/2/3a), food-production capacity and soil carbon sequestration, and whether alternatives have been prioritised. **(Ann Belcher; Backwell PC; Nailsea TC; Flax Bourton PC; Brockley PC; Backwell Residents Association; Nailsea Action Group; C Welch; Cassie and Brian Allsop; Christopher W; J Haskins; Cllr B Petty; Guy Stone; Mrs Wendy Derrick; P Parsons; Priscille Lesne; Wrington PC; S Scott; CPRE; Gill; Graham Scott; Grahame Dixie; Justina Lewis; R Bettison; Oliver Ellis; Grahame Dixie; CPRE)**	National planning policy does not preclude development on best and most versatile land and this is one of a range of factors that have been taken into account in determining the proposed allocations. The loss of agricultural land is addressed further in the best and most versatile agricultural land background paper, and covered further in responses to Policy DP53.
Requests that the policy/schedules specify an appropriate housing mix (not dominated by larger 4–5 bed homes) and deliver genuinely affordable homes aligned with local need. **(J Haskins; Cllr B Petty; Justina Lewis; R Bettison; T Crane; Rubix Strategic Land)**	Policy DP46: Housing types and mix requires that: *"New residential development is required to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Local Housing Needs Assessment. New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location."* On developments of 10 or more dwellings - all of the proposed allocations in Nailsea and Backwell - development proposals are required to demonstrate that they have taken into account local needs evidence and planned accordingly with an appropriate mix of homes.
Detailed objections that flood risk is under-stated for Nailsea and	The local plan is supported by a Strategic Flood Risk Assessment Level 1 and

Backwell and that parts of the strategic growth area and key access infrastructure are in Flood Zone 3 and/or affected by surface-water flows, high groundwater and fault/ground conditions; and that this undermines soundness and deliverability. **(Backwell PC; Nailsea TC; Flax Bourton PC; Brockley PC; Backwell Residents Association; Nailsea Action Group; Adam Bloom; C Welch; Chris; J Haskins; Mrs Wendy Derrick; P Parsons; P Moran; S Scott; Andrew Rowland; Cassie and Brian Allsop; Cllr B Petty; James Hobbs; Jeanne Craske; J James; Jessica Houlden; RJ Jeffries; R Bettison; Oliver Ellis; Rod Neal; Diane Snape; T Crane; Gleeson Land)**	Level 2 that provides an evidence base as to the current and future flood constraints across North Somerset. The proposed allocations have been considered through the SFRA to identify the extent of flooding affecting them. The sites around Nailsea and Backwell are not indicated to be at extensive flood risk, however site-specific flood risk assessments are required at planning application stage for each site, and those assessments will provide further detail. In line with the PPG, where surface water flooding is an issue the priority is to ensure the development can be made safe for its lifetime and to avoid vulnerable development on more constrained parts of the site through effective masterplanning. Officers have engaged with Backwell Parish Council on flood risk matters and are considering the issues further via additional modelling to provide a consistent basis for considering planning applications.
Site-specific objection that vehicular access for the Land south of Nailsea site relies on works through Flood Zone 3 / River Kenn floodplain and that repeated hydraulic modelling has not resolved Environment Agency concerns, calling into question deliverability and suitability of the allocation. **(Backwell PC; Nailsea TC; Flax Bourton PC; Brockley PC; Backwell Residents Association; Nailsea Action Group)**	The local plan allows some flexibility for access to Land south of Nailsea however an access through the flood zone is currently being considered through a planning application.
Site-specific objection relating to Pound Lane, Nailsea - **r**equest to delete Pound Lane allocation due to impacts on nature reserve, high landscape sensitivity, ecological harm and proximity to land at risk of flooding; and concern that alternative locations outside Nailsea/Backwell were not adequately considered. **(Backwell PC; Nailsea TC; Flax Bourton PC; Brockley PC; Backwell Residents Association; Nailsea Action Group)**	The site has been assessed through the plan making process and it is considered that the site can be developed subject to an appropriate design and any required mitigation.
Site-specific comments regarding land east of West Leigh Primary/Infants School) – requests to protect as green infrastructure or Local Green Space. There are requests to remove this field from the Grove Farm/Rodney Road allocation, citing its value for children's play/learning, wellbeing, biodiversity, buffering, and potential designation as Local Green	It is not proposed to remove this land from allocation in the plan. It is proposed as part of the Grove Farm allocation and is owned by NSC. Whilst there are no confirmed proposals for the site, it is considered beneficial to include in the plan to provide some additional potential residential capacity if this is needed, although other uses may be considered appropriate in future.



Space. **(Cllr B Petty; Ed Aldred; Jack Nicholls; Jessica King; Ralph Wood; Ribbon; F Parry)**	
Site-specific request from developer of Land south of Nailsea site to amend the allocation/policies map to reflect the link road route and allow a larger developable area south of Nailsea; remove or refine requirements (e.g., single masterplan; specified number of schools) and clarify access arrangements (including objections to reliance on The Perrings), alongside points about viability and alignment with transport evidence. Transport note submitted with representation. **(Gleeson Land)**	The Council do not agree to remove the requirement for a single masterplan for this site since it comprises multiple land interests and the masterplan is a mechanism to ensure coordination and sound planning. This reflects a key NPPF objective of achieving well-designed places. A masterplan is considered key to achieving the objectives set out in NPPF paragraph 135. Paragraph 77 -C of the NPPF also highlights the use of masterplans to secure a variety of well-designed homes. The Council acknowledge the proposed access road identified by Gleeson but do not necessarily preclude other alternatives subject to transport assessment.
Concerns that delivery of this strategic location relies on multiple sites coming forward in step, without a binding framework to coordinate infrastructure; that major transport interventions (incl. link road/rail crossing) lack secured funding; and that plan assumptions (including windfall delivery rates) are overly optimistic, creating under-delivery risk. **(Harrow Estates; I Forsyth; Wraxall and Failand PC; Mac Mic Strategic Land; Rubix Strategic Land; T Crane)**	The policy requires a phasing plan to be submitted with planning applications indicating how the development will be phased alongside infrastructure. This is especially significant for those allocations that contain elements of identified infrastructure e.g. schools and transport. A coordinated approach will be implemented to infrastructure funding and across the development sites and the IDP sets out further details to support delivery including in relation to the accumulation of s106 funding. This is supported by detail set out in the Nailsea and Backwell Transport Strategy and Policy LP3.
Site-specific heritage impacts on Land East of Backwell and wider setting. Concerns are raised about impacts on designated and non-designated heritage assets (including settings, key views, conservation areas and listed buildings) and requests for clearer evidence and/or revised assessment conclusions and heritage-led masterplanning/mitigation. **(Historic England; Wain Homes (Severn Valley) Ltd; Diane Snape)**	On page 11, the Historic Environment Assessments Report (Sep 2025) prepared to support the local plan highlights that: *" Part of [the East of Backwell] site has high heritage sensitivity and there is potential for harm to a number of highly graded heritage assets. A detailed design code and a heritage-led master plan will be required to mitigate harm."* In response to this, the Local Plan Schedule 1 Site-specific requirement for this site includes the following: *"Consideration of heritage sensitivity and appropriate response to site planning required. Development should follow a heritage-led masterplan which preserves key views from heritage assets and provides buffer zones to maintain sense of rural setting, as set out in the Historic Environment Assessment"*
Site-specific comment regarding Grove Farm Backwell, and the	This is not considered necessary to include as the plan as the matter was

Grant Mills PROW level crossing – requests for the plan to explicitly require assessment and mitigation where development would materially increase use of a railway level crossing, including grade separation or diversion of the public right of way, funded via developer contributions. **(Network Rail)**	considered as part of the Grove Farm planning application, for which outline consent has been granted.
Site-specific comments on the Poplar Farm and North Nailsea sites - requests to remove Poplar Farm / north Nailsea allocations due to flooding/wet ground, on-site constraints (e.g., services), unsafe walking routes/no pavements (including school routes), and concern that additional traffic would deter active travel and worsen air quality/road safety. **(Oliver Ellis; Jessica Houlden; J James; Susan Laver)**	These sites have been considered by flood risk officers and there is no basis to justify removing them on flood risk basis. Site-specific flood risk assessment will be required to support a planning application with any necessary mitigation identified to address any concerns.
Site-specific representations from the developers controlling the land that comprises the East of Backwell allocation. Requests to amend the proposals map/policy to align the link road within allocated land control and reference independent access; clarify which elements are developer-delivered vs externally funded; reconsider employment land and 50% affordable housing requirements on viability grounds; and provide clearer Nature Park locations/requirements. **(Rubix Strategic Land; Mac Mic Strategic Land; Persimmon)**	It is agreed to alter the alignment to include the route within land controlled by promoters and promoted through the local plan. A proposed modification to the alignment on the policies map has been made to address this, and the requested funding/costing information is included within the IDP. At Natural England's request, a proposed change is also made to the definition of nature parks in the plan, to aid clarity. No changes are proposed in respect of employment land or affordable housing.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support 50% Affordable housing on Green Belt land. **(Cllr B Petty)**	Support welcome.
Support Nailsea and Backwell as a Strategic Location. **(Crest Nicholson)**	Support noted.
BNSSG Integrated Care Board generally supports Policy LP3 and considers that this policy wording provides sufficient flexibility in order for the ICB to establish the preferred primary care mitigation approach in Nailsea and Backwell. The policy is	Noted.



justified as it is founded on robust evidence presented in the Infrastructure Delivery Plan. **(BNSSG ICB)**	
National Highways welcomes the requirement for a strategic and coordinated approach to transport investment, particularly to address the cumulative impacts of proposed development. Welcome the policy wording that, "Development proposals will require specific phasing conditions and/or obligations to be secured to ensure any required supporting infrastructure is delivered at the appropriate time". **(National Highways)**	Noted.
Welcomes the reinstatement of Policy LP3 and the selection of Nailsea and Backwell as a strategic focus for development, given the significant challenges presented in terms of satisfying the need for new homes and the inherent sustainability of both settlements in terms of local employment, services and transport. **(Taylor Wimpey)**	Noted.
Support for growth proposals at Backwell. **(Mac Mic Strategic Land)**	Noted
Suggested modifications:	
Prioritise higher density and brownfield development over releasing greenfield sites. **Adam Bloom** Remove Backwell from the strategic area and remove most of the East of Backwell housing (retain only limited land around Backwell Common/railway plus link road). **Anthony John Cox** Delete LP3, delete key allocations, revise Nailsea transport strategy (incl. remove rail crossing), and reallocate c.1,600 homes largely to South of Long Ashton and other sustainable villages outside the Green Belt.	



Backwell PC / Nailsea TC / Flax Bourton PC / Brockley PC / Backwell RA / Nailsea Action Group

Build a new link road from the A370 (near Brockley) to M5 J20 (with spur to Nailsea trading estate) to bypass Nailsea/Tickenham and reduce HGV impacts.
Barry Stirling

Provide a funded direct link from Nailsea to M5 J20 (via Nailsea Wall) and introduce 20mph/traffic calming on key local roads.
Bruce Campbell/ Lynton/ Mike Perrott/ Peter King

Do not grant permission for the main allocations unless there is a credible, fully funded and approved plan for the Cross Rail Link (including the railway bridge).
CPRE, David Gray

Reallocate growth to the south of Long Ashton near the EPIC campus and identify deliverable mitigation on the B3130/B3128 corridor.
Dave Mazur

Protect Grade 1 land, avoid floodplain development, protect biodiversity/bats, deliver a workable relief road, and address accessibility and services (station, buses, healthcare).
Elizabeth Porter

Protect the field by West Leigh School as Local Green Space and remove the Gleeson allocation due to impact on the Strategic Gap.
F Parry/ Jack/ Nicholls Jessica King/ Ralph Wood

Plan is disproportionate and lacks essential infrastructure; propose a motorway link (Long Ashton bypass to M5 J20) before further development.
G Thomas

Amend the South Nailsea allocation/policy: extend the area/uplift numbers, remove school and single-masterplan requirements, remove access via The Perrings, show link road route on Policies Map, and update SA/HRA/Sequential Test due to floodplain road route.
Gleeson Land

Strengthen protection of small green spaces in Nailsea from infill to protect wellbeing and local character.



Graham Scott

Require independent soil evaluations with applications; prioritise poorer-quality land/brownfield; benchmark approvals on Grade 1–2 land.
Grahame Dixie

Take a more proactive stance on sustainable transport and create an overarching place-based vision/SPD for Backwell before piecemeal applications.
Helen Nelson

Clarify whether high heritage sensitivity areas should be avoided and whether the allocation/capacity is justified and evidence-led.
Historic England

Fix and protect a clear southern settlement boundary for Backwell (avoid sprawl beyond a “hard edge” such as the recycling centre).
Jack Nicholls

If the plan proceeds, it needs better roads plus firm funding for schools and leisure facilities.
James Hobbs

Reduce Nailsea/Backwell numbers, avoid floodplains, assess impacts of permitted schemes first, deliver infrastructure before housing, and ensure housing mix meets needs.
Jeanne Craske

Do not build on North Nailsea allocation due to wetland/wildlife value and flood risk.
Jessica Houlden

Address the station under-bridge pinch point (e.g., separate pedestrian tunnel) and specify station improvements as part of the plan.
M Chamberlain

Amend LP3/Schedule 1 to justify requirements and explicitly reference development costs/viability for phasing and obligations.
Mac Mic Strategic Land

Strengthen permeability and fully explore secondary access from The Perrings/Youngwood Lane.



Persimmon Homes

Exclude Backwell from the strategic location, redistribute growth toward South West Nailsea, and sequence delivery away from Green Belt sites.
Miller Homes

Prioritise brownfield and empty homes; push developers onto less desirable sites; protect greenfield/nature.
Guy Stone

Remove unconsented proposals.
Mrs Wendy Derrick

Provide detailed CRL costings and account for knock-on traffic impacts.
Nailsea Action Group

Apply Golden Rules correctly (45% not 50% here), make contributions proportionate to impact, and complete Nailsea/Backwell-specific viability and CIL/S106 clarity.
Nailsea Holdings LVA LLP

Housing should not proceed until a financially realistic and effective transport plan is in place.
Oliver Ellis

Amend map/policy: show southern access onto A370 from Rubix land; keep link road within allocation; clarify delivery responsibility; make requirements viability-linked; remove employment land; reduce/qualify affordable housing; clarify Nature Parks.
Rubix Strategic Land

Create “whole communities” and expand Weston and Bristol where infrastructure already exists.
Stephen Falk

Make infrastructure a precondition; re-evaluate flood-prone/eco-sensitive Green Belt sites; protect bat corridors; deliver active travel early; strengthen employment and services strategy. Scale back housing; bind S106 triggers; test Golden Rules viability; safeguard school/community sites; prioritise avoidance over offsetting for ecology/floodplain.



T Crane

Provide transport infrastructure for the scale of growth, including a Nailsea–Clevedon road link and upgrades to support active travel and reduce through-traffic.
Tickenham PC

Exclude Backwell from the strategic location; redistribute growth to Nailsea and Weston-super-Mare, prioritising medium sites at Weston ahead of Green Belt locations.
Tom Rocke

Supports Nailsea as strategic; wants contributions proportionate and their consented site not delayed by wider phasing; cites planning obligation tests.
Vistry Group

Supports strategy aims but says Nailsea site selection is inconsistent; requests reassessment of Land Northeast Nailsea.
Wain Homes (Severn Valley) Ltd

Prefer removing Nailsea/Backwell as strategic location; if retained, pace development to completed infrastructure (especially the Cross Rail Link).
Wraxall and Failand PC

Reduce housing; protect quiet lanes and biodiversity; deliver active travel links; produce a realistic traffic plan; coordinate with WECA; control lighting.
Frances Sheridan

Protect Grade 1 Green Belt land/food security; no credible infrastructure/funding; floodplain and Backwell Lake impacts; bat/SSSI legal protections.
Sue Hynam



LP4: Strategic Location: Pill and Easton-in-Gordano

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Number of objections based on policy being not compliant with Duty to Co-operate: 56	
Main Issues Raised:	**North Somerset Council Officer Response:**
Significant objection to the proposed level of housing development at Pill and Easton-in-Gordano. The main themes raised by residents are set out below from the following respondents. **(Julian E, Hugh Matthews, Anna Matthews, James Ryan, Mrs S E Clarke, P Wright, Kieran Argo, H Gardner, Linda O'Hara, R Gentilli, Penny Town, S Tomlinson, Edward Drewett, Mr Christopher, Mrs Flannigan, E Tomlinson, Sally Badham, Rob Harvey, G Macpherson, H Sykes, Malcolm Ingram, Catherine Obrien, Carl Harrell, Mrs G Hills, Abbots Leigh Parish Council, Pill & Easton-in-Gordano Parish Council, Ian Hingley, Neil Wolstencroft, Simon Beck, Barbara Poole, J Spicer, Lucy Byrne, Margaret Pownall, Rob Harvey, Susan Jane Loader, E Beacon, David Yates, Nick Wallum, Kevin Payne, George Donaldson, Julian Bowyer, DK Sayner, Jon Gittoes, P Evans, Aileen Edwards, J Charlewood, Laura Norton, Richard White, Maureen Butterly, M Senior, Justin Saunders, Councillor Jenna Ho Marris, A Molony, Wayne Davey, Sian Clark, Mr Burton, Robert Narracott, Clare Smith, Samantha Joyner, Justin Saunders, Matt Burley, G Rich, Chris Tucker, Heather Barbara Streeter,**	The scale of objection to this policy and proposed allocations at Pill and Easton-in-Gordano is noted and understood. Responses are made to the separate main themes raised by these respondents below.



Sustainable Pill & District, S Floyd, Sian Narracott, Kamala Das, Rachel Harvey, Alexander Nell, Dick Douglas, Jenny Shah, Chrissy Weidner, Elizabeth Wright, Lesley Davey, Peter Milner, Barbara Poole, Simon Beck, Margaret Pownall, David Yates, Jenny Ingham, L Brown, Leiza Alpass, Nigel Pearce, Tony Molony, Iain McDowell)	
Significant highways and transport concerns are raised by respondents. The main themes listed include: • The impact on the local highway network with J19 of the M5 and A369 cited as being areas which already experiences congestion and the concerns over the proposed development and the cumulative impact of other proposed development in the north of the district on these locations. Concern that there are unresolved objections from National Highways. • The transport mitigations rely too much on active travel which isn't suitable for everyone and bus services which are unreliable. • Concerns that some roads through the village are narrow and unsuitable for increased traffic and the impact on children's safety. It is felt that the evidence is unclear regarding the mitigations needed to resolve any transport issues. • Over reliance on the new railway opening to justify Pill as a sustainable location but concerns raised that the proposed railway service would have limited capacity, would not reduce commuter traffic and is some distance from the proposed sites. • The impact of traffic being diverted from the A4 at Junction 18 to avoid the Bristol Clean Air Zone has not been fully assessed. • The road narrows dangerously at the George pub in Abbots Leigh where two commercial vehicles are unable to pass side by side and where there is no option to widen. • Planned airport expansions will add flow onto the A369. • Existing active travel routes are not suitable or useable enough to result in the mode shift required to reduce car usage - Invest	Pill and Easton-in-Gordano is considered to be a sustainable location in regards to transport. It is located on/adjacent to a key public transport corridor (A369) providing connectivity to Portishead and Bristol and is well served by public transport (with20 min frequency). Improvements to the bus infrastructure are planned to include Bus Priority measures and J19 and strategically located Local Transport Hubs. Delivery of the Metrowest Portishead Rail project has recently begun with re-opening of the line expected 2028. NSC has developed a strategic traffic model which has been used to identify future traffic impacts across the network. We have identified highway constraints at M5 J19 and are working closely with National Highways to develop appropriate capacity and road safety improvements to mitigate development. Our Transport Assessment sets out our Vision-led approach to transport in line with NPPF guidance. We have proposed a package of sustainable transport mitigations to facilitate sustainable transport choices and to reduce reliance on private car trips; these measures include improvements to existing facilities (especially where provision is substandard) and development of a network of new routes to connect developments to community services, education and public transport hubs. These measures, in combination with planned improvements to public transport infrastructure, will facilitate mode shift in line with the transport vision.



and improve existing active travel routes • Request to Complete modelling of J19 impacts so that mitigations can be proposed and scrutinised. • Detailed comments on the TA's modelling	
Environmental/Green Belt Concerns are referred to in many representations. Particular points raised include: • Loss of valued open space used for exercise and recreation and concern regarding the impact loss of this space will have on the mental wellbeing of residents. • The level of carbon emissions resulting from the new development through construction, increased car use and loss of countryside for carbon sequestration. • Concern regarding environment and ecological impacts on sensitive areas such as Bats SAC and Severn Estuary SSSI and that a Habitat Regulations Assessment hasn't been undertaken. • Loss of wildlife on proposed allocation – newts, toads, blue tits, skylarks, lapwing, Linnet, water voles, waterbirds. • Loss of agricultural land. • Loss of Green Belt and whether this is justified, whether exceptional circumstances exist to release land from the Green Belt, disagree that the sites are grey belt and claim that not all brownfield land options have been considered, including sites on the brownfield land register.	New development on the allocations at Pill and Easton-in-Gordano is required to provide new high quality, well designed green spaces that are accessible to the public. This result in an increase in accessible usable public open space than currently provided by these sites. A Habitat Regulations Assessment has been undertaken for the North Somerset Local Plan and appropriate mitigations identified to ensure that there are no adverse impacts on the integrity of the SACs. All the proposed allocations at Pill and Easton-in-Gordano are classified as 3b on the DEFRA agricultural land classification map. This means they do not constitute Best and Most versatile Agricultural Land. Due to the increase in North Somerset's housing requirement through the introduction of the mandatory standard method in the NPPF (Dec 2024) North Somerset cannot sustainably meet its housing requirement on sites outside the Green Belt. This constitutes exceptional circumstances and, in such instances, the NPPF directs local authorities to review their Green Belt boundaries and propose alterations to meet their housing need in full. As such North Somerset have undertaken a two stage Green Belt review and released land from the Green Belt for housing allocations.
Scale of Development: • It is a disproportionate level of development for the village. Respondents cite a potential 44% population increase and concerns this will have on existing infrastructure, loss of the character of the village and community cohesion. • Density in other locations is not optimised.	Due to the government's housing requirement for North Somerset all the proposed allocation at Pill and Easton-in-Gordano are required to meet that housing requirement. Furthermore, there are significant benefits of having a critical mass of development to allow the delivery of infrastructure to support and benefit the existing and new communities such as a new primary school and improved active travel routes. Densities on other sites is being optimised particularly at other strategic locations where new local



• Request to remove or significantly reduce the scale of housing allocations at Pill/Easton-in-Gordano – with particular emphasis on removing the Pill Green site.	centres and transport hubs are proposed and on brownfield sites in town centres.
Procedural Concerns: • Conflict with the made Neighbourhood Plan for the area which proposed 150-200 houses for the area – therefore ignoring local democracy. • Duty to co-operate has not been undertaken • The policy is contrary to the Equality Act 2010, including the Public Sector Equality Duty, and there is no accompanying evidence such as an equalities impact assessment, infrastructure delivery plan, statements of common ground, carbon assessment or health impact assessment, ecological surveys, flood risk assessment, ALC survey or ancient woodland buffer or green belt assessment. • Concern from local residents regarding the lack of consultation about the proposed allocations during the Additional Sites consultation (Feb/March 2025) which were then included in the plan at a relatively later stage. This doesn't comply with the councils Statement of Community Involvement. A petition of over 2000 people has been signed in protest at the lack of engagement. • Pill seems to have been added late in the process as an after thought and has not received the same level of consultation, modelling, analysis and rigour in identifying mitigations. • Request for further public consultation at Pill and Easton-in-Gordano. • Produce an SPD to set out in detail how the sites will be delivered in a co-ordinated way with the required infrastructure.	The NDP for Pill and Easton-in-Gordano is aligned with the strategic context set out in the adopted Core Strategy. This is a new Local Plan that will supersede that strategic context. Effective co-operation has been undertaken with relevant stakeholder such as neighbouring authorities and statutory consultees. This is set out in the Statement of Compliance and individual Statements of Common Ground. There is a bank of evidence which supports the Local Plan including and Equalities Impact Assessment, Duty to Co-operate Statement of Compliance and Statements of Common Ground, Habitat Regulations Assessment, Sustainability Assessment, Transport Assessment and two Green Belt Assessments. These are all available to view on the Local Plan Evidence Base page. SPDs cannot be adopted until the Local Plan is adopted. Furthermore, the governments new planning regulations no longer allow for the production of SPDs. However, Policy LP4 provides a detailed framework to ensure the sites at Pill and Easton-in-Gordano are delivered in a comprehensive way. The Regulation 19 consultation has enabled residents to raise concerns and issues they have with the proposed housing allocations. These will now be considered through the Local Plan Examination process.
Infrastructure Concerns: • Concerns regarding impact on local infrastructure particularly GP	A detailed Infrastructure Delivery Plan sets out all the infrastructure required to support additional growth within the communities of North



surgeries and schools which it is felt do not have the capacity to cope with the additional population. • Concerns about lack of detail regarding the delivery of infrastructure – when it will be delivered, how it will be delivered in terms of funding and where it will be delivered.	Somerset, along with when and how it will be delivered. For Pill and Easton-in-Gordano it identifies the need for a new 420 place primary school as well as transport and highways improvements.
<u>Other concerns:</u> • Concern regarding flooding on land around Markham Brook and the Lodway Farm site and impacts from run off from developing these sites on the rest of the village. • Concern over the impact of sites either side of Markham Brook on the ancient woodland. It is felt that there should be a 15m buffer between the ancient woodland and any development on these sites. • Concern over noise and pollution from M5 for sites near the motorway. • Concerns that Pill and Easton-in-Gordano isn't a sustainable location as it doesn't have employment opportunities and doesn't have a wide range of services and facilities. • Concern over developing beyond existing settlement boundaries. • Viability assessment suggests that a target of 50% affordable housing may be 'challenging' for the proposed sites in existing Green Belt land around Pill and Easton-in-Gordano. • LP4 conflicts with multiple strategic policies (SP1, SP2, SP3, SP6, SP10, SP11). • Concern over impact on landscape and that no Landscape and Visual Impact Assessment (LVIA) is provided. • Prior's field in Easton-in-Gordano has village green status, as it has great value to us as a recreational space in Easton-in-Gordano. • Lack of connectivity between the proposed sites and to existing services and facilities, or to areas of employment such as the Port and could create disconnected dormitory estates.	For both Pill Green and Land at Pill Road sites the following requirements are set out in schedule 1: • Development must provide a buffer strip to Markham Brook main river and flood risk mitigations will be needed to ensure no increased flood risk arises downstream. • No increased surface water run-off will be permitted to ensure nearby culvert and pumping station do not reach maximum capacity, f low rates must be at least retained if not reduced. The site specific requirements set out in Schedule 1 of the plan for these sites require *"Detailed noise modelling required to assess noise from the nearby M5 with appropriate master planning and other features to mitigate any impact*". The settlement boundaries for all settlement in North Somerset have been comprehensively reviewed as part of the Local Plan process. Where new allocations are proposed adjacent to settlements the settlement boundaries have been redrawn around those allocations. The requirement for 50% affordable housing is the expectation as to what will be required on these sites which are being released from the Green Belt as set out in the Golden Rules. Policy DP43: Affordable housing does however, all for a case by case consideration if it can be fully justified why the requirements cannot be met. It is recognised that Priors Field has village green status and there are no allocations on Priors Field. It has been excluded from the Pill Green Allocation for that reason.



	Policy LP4 puts a significant emphasis on increasing connectivity between the sites through new and improved active travel connections.
Respondents have raised the issue that it is not practical or feasible to have an active travel link across Markham Brook due to the physical geology of the ravine and the ancient woodland that surrounds the Brook. **(Julian E, Abbots Leigh Parish Council, Pill & Easton-in-Gordano Parish Council, Wayne Davey, Sustainable Pill & District, Catesby Estates)**	Development of safe and direct active travel routes connecting developments and providing access to education, employment and community services is desirable. Whilst a crossing of Markham Brooke would provide the most direct route, should this alignment not be achievable then alternative provision shall be required. It is therefore proposed to make a minor amendment to the policy wording to reflect this with Markham Brooke identified as the desirable route, if feasible.
There should be a requirement for a Nature Park at Pill and Easton-in Gordano as there is for the other strategic locations. **(Sustainable Pill and District)**	Pill and Easton-in-Gordano is not as large as the other strategic locations which are all over 3,000 dwellings. As such it is not deemed necessary to require a strategic Nature Park solution in the same way. However, all the sites will be required to provide appropriate Bat mitigation habitat in the form of onsite or off-site Nature Park provision on an individual basis. More information regarding the deliver of Nature Parks can be found on our website at North Somerset Nature Parks | North Somerset Council
Some respondents felt all the proposed sites would result in an amount of development that is disproportionate to the size of the village but suggested two sites they felt would be acceptable in terms of scale: Land at Ham Green and Land east of Gordano Services. **(Mr Christopher, Mrs Flanagan)**	It is acknowledged that some residents feel the level of growth proposed at Pill and Easton-in-Gordano is disproportionate. However, due to the governments housing requirement for North Somerset all the proposed allocation at Pill and Easton-in-Gordano are required to meet that housing requirement. Furthermore, there are significant benefits of having a critical mass of development to allow the delivery of infrastructure to support and benefit the existing and new communities such as a new primary school and improved active travel routes.
No Supplementary Planning Document (SPD) has been prepared by North Somerset Council to support the inclusion of Policy LP4 – Strategic location Pill and Easton in Gordano, this should have been completed and taken into consideration when deciding the scale of the development of the area and what the local infrastructure could support. **(Abbots Leigh Parish Council, Jenna Ho Marris)**	Supplementary Planning Documents (SPDs) provide detailed guidance to an adopted policy or allocation in a Local Plan. SPDs cannot be adopted until the Local Plan is adopted. Furthermore, the government's new planning regulations no longer allow for the production of SPDs. However, Policy LP4 provides a detailed framework to ensure the sites at Pill and Easton-in-Gordano are delivered in a comprehensive way, and further guidance can be produced in future if this is considered necessary.
Amend the policy to confirm that any growth in this location will be	The proposed allocations at Pill and Easton-in-Gordano are to meet the



exclusively to meet unmet needs arising from within Bristol City and will not contribute towards meeting North Somerset's needs. There are suitable alternatives to meet North Somerset's needs in accordance with the spatial strategy, including at Nailsea and Weston-super-Mare. **(Miller Homes, Tom Rocke)**	housing need for North Somerset. It is accepted that Bristol City Council has identified unmet need, however their Local Plan remains in its examination phase and the quantum of unmet need has not yet been confirmed, nor has any work been undertaken with neighbouring authorities to look at how this should or could be apportioned. North Somerset Council is committed to working with the West of England authorities to produce a Spatial Development Strategy, as directed by the government. This is the appropriate mechanism to address the needs of the sub region as a whole.
Objection that the obligations in the policy are not proportionate to the scale and location of some of the sites, particularly land at Lodway Farm which is a relatively small development in comparison to other proposed allocations in and around Pill and Easton in Gordano. As such it is suggested that the word proportionate is included within the policy (see suggested modification below). More housing can be delivered at Lodway farm than the proposed 160. Barratt and Strongvox Homes are in joint control of Land at Lodway Farm. Strongvox is preparing to submit a full planning application for approximately 60 dwellings, whilst the Barratt controlled land has capacity to deliver up to 115 dwellings. We therefore request that the indicative capacity of this site is increased to 175 dwellings to reflect this. **(Barrett Bristol)**	Development contributions will be negotiated as applications for individual sites come forward. As part of this appropriate infrastructure will be required from each site to contribute towards the wider vision of Pill and Easton-in-Gordano as set out in the policy to ensure a co-ordinated approach to the delivery of the vision. The suggested increased capacity is noted. All capacities are indicative and have a base date of April 2025, they represent that point in time. It is accepted that capacities may increase, or indeed decrease, as site planning progresses. A full updated list of capacities will be presented as part of the 2026 residential land survey work, which is usually published in June each year.
Concern that the expectation that the site delivers 50% affordable housing is excessive, and does not suitably reflect both the constraints of the site (including non-developable buffers to the motorway) and/or other requirements including the provision of targeted local transport improvements and education contributions, such that may cumulatively undermine viability. **(Strongvox Ltd)**	The requirement for 50% affordable housing is the expectation as to the level of affordable housing that will be required on these sites which are being released from the Green Belt as set out in the Golden Rules. However, DP43 allows case by case considerations, with the inclusion of the following wording: *Developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7, and other Green Belt sites, 30% on greenfield sites and 20% on previously developed land, all at nil public subsidy. If these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment*



	which must demonstrate that all grant funding sources have been fully explored. The viability evidence supports this approach, explaining: *There may be opportunities to secure enhanced affordable housing delivery which would be missed if the target percentage(s) were set too low. For example, there may be circumstances including sites or locations supporting increased viability and which may secure permission later in the plan period, or localised opportunities even within areas otherwise indicated as having lower viability more typically. Therefore, the Council should not rule out higher proportions of affordable housing being secured in individual cases. If a higher policy percentage is set than broadly indicated through the results of this and previous viability work, then our recommendation would be for that to continue to include an acknowledgment of the role of viability and potential flexible approach within policy.*
Concern that the policy does not specify how the co-ordination of all local infrastructure and facilities will be achieved, with no further details as to what is expected from each site in terms of on-site provision and necessary financial contributions. For the Policy to be precise, effective and found sound, there needs to be further direction regarding the interaction of the allocated sites and how they will be expected to co-ordinate in order to deliver the policy aspirations. **(Lands Improvement Holdings Ltd)**	It is more appropriate to set out this level of detail in the Infrastructure Delivery Plan which accompanies the Local Plan. The Local Plan itself is clear that all new development will be required to contribute to the delivery of necessary infrastructure through either direct delivery as part of the scheme or through development contributions.
Querying the accuracy of the Sustainability Appraisal assessment for SHLAA sites HE2O6, HE20491, HE2015, and HE201097. **(Paul Pownall)**	Comments noted. Concerns include distance from sites to employment. Interpretation of what constitutes an employment site may differ.
Concern regarding proposed allocations which it is felt threatens a suite of sites of local conservation interest including Ox House Bottom and Markham Brook SNCI, Fields west of Blackmoor Road SNCI, St Georges Flower Bank SNCI and the Pill Paddock site; these sites are all located within an area currently designated as	A Habitat Regulations Assessment has been undertaken to assess the potential effects of the North Somerset Local on the National Site Network of Special Areas of Conservation, Special Protection Areas and Ramsar sites. As a result, appropriate mitigations have been incorporated into the plan to ensure there are no likely significant effects on these sites.



Green Belt and they provide valuable habitat corridors between the River Avon and habitats to the south of Pill. The scale of the loss of Green Belt within the proposal is of significant concern. **(Avon Wildlife Trust)**	
Support/Other Comments:	**North Somerset Council Officer Response:**
BNSSG ICB considers that this policy has been positively prepared as it provides infrastructure providers including the NHS with certainty that developer contributions may be required to provide supporting infrastructure on schemes in Pill and Easton-in Gordano. **(BNSSG ICB)**	Comments noted.
By concentrating these four developments close together will enable better transport links to be provided to a location that is already close to the M5. This makes it much more sustainable and minimises the effects of climate change. **(R Snook)**	Comments noted and agreed.
The 'site requirements' on page 276/277 in the Plan appear to reflect to the HEA recommendations to positive respond and minimise harm to affected heritage assets **(Historic England)**	Comments noted.
Support from the developers of the proposed the proposed allocations at Pill and Easton-in-Gordano and the decision to identify Pill and Easton-in-Gordano as a sustainable strategic development location, and acknowledge the key role the site plays in the delivery of the ambitions set out within the Pre-Submission Plan for the area. **(Catesby Estates, Waddeton Park Ltd, Strongvox Ltd, Barrat Bristol and Lands Improvement Holdings Ltd)**	Support welcome and comments noted.
Suggested modifications:	

Responses from respondents are largely seeking the allocations at Pill and Easton-in-Gordano to be removed from the plan
(Local residents)

Remove reference to active travel route crossing Markham Brook.
(Catesby Estates, Waddeton Park, Various)

Add requirement for Nature Park at Pill/E-in-Gordano like at other strategic locations.
(Sustainable Pill and District)

Increase capacity at Lodway Farm to 175 dwellings.
(Barret Bristol)

Add the word proportionate to the policy: *"All new development will be required to contribute to the delivery of necessary infrastructure through either direct delivery as part of the scheme or through proportionate development contributions. A new 420 place primary school (including early years provision in line with government requirements), along with financial contributions towards post 16, special educational needs provision and family centre services will be required to meet the needs of the expanding community."*
(Barret Bristol)

The allocation should be worded to specifically 'permit up to 100 dwellings' and additionally 'support, but not require, a care home on the site' (or similar wording).
(Waddeton Park Ltd)

Policy should be more specific regarding delivery of infrastructure e.g. which sites deliver certain infrastructure and when.
(Lands Improvement Holdings Ltd)

LP5: Housing and employment allocations and Schedule 1 and Schedule 2

Policy LP5: Housing and employment allocations	
Number of representations received: 78	
Number of objections based on policy being unsound: 54	
Not positively prepared: 37 Not justified: 39 Not effective: 45 Not consistent with national policy: 40	
Number of objections based on policy being not legally compliant: 16	
Number of objections based on policy being not compliant with Duty to Co-operate: 22	
Main Issues Raised:	**North Somerset Council Officer Response:**
General opposition to scale of growth and/or specific site allocations. **(Adrian Mealing, Backwell PC Nailsea TC Flax Bourton PC Brockley PC Backwell Residents Association and Nailsea Action Group)**	Objections to the level of growth proposed are addressed under Policy SP8: Housing, and comments on individual sites are listed against Schedule 1 and 2.
This policy only requires the allocations to comply with the site-specific requirements and is therefore unnecessary. **(Gleeson Land)**	The purpose of this policy is to allocate the specific sites. Schedules 1 and 2 of the plan form part of this policy, although for presentational purposes feature at the end of the document.
Query why the council has chosen not to include a list of the housing and employment allocations within the wording of the policy. **(Home Builders Federation)**	The policy text clearly states that schedules 1 and 2 form part of the policy. They are at the back of the document rather than within the policy itself for presentational purposes and ease of reading.
Sites with extant consents should not be allocated. **(Miller Homes)**	It is perfectly reasonable to include sites with a planning permission as allocations.
Site specific requirements fail to make reference to the need for supporting primary care infrastructure. **(BNSSG ICB)**	For strategic growth locations the provision of infrastructure is covered within the overarching locational policies LP1, LP2, LP3 and LP4. Policy DP63 requires development proposals to provide financial contributions towards the cost of infrastructure to accommodate growth, including health facilities, and this will be considered on a case by case basis for individual sites.



Support/Other Comments:	**North Somerset Council Officer Response:**
Suggestion that development briefs should be included for all proposed allocations. **(Burrington Parish Council)**	The site-specific requirements contained within Schedule 1 are considered to provide a proportionate level of detail.
Exolum Pipeline Services have provided a plan of their apparatus. **(Exolum Pipeline Services)**	Noted.
Comments provided on individual sites by Environment Agency. **(Environment Agency)**	Comments on individual sites are considered on a case-by-case basis.
All new dwellings should provide for new, or enhance existing, sport and recreation facilities. **(Sport England)**	If any allocations result in the loss of sports facilities this is addressed on a site-by-site basis.

Suggested modifications:

Numerous alternative residential sites promoted, that have already been considered by the council, including:

- Bridge Farm, Weston-super-Mare **(Autograph Homes)**
- Stonebridge Farm, Wolvershill (land designated as Strategic Gap) **(Ainscough Strategic Land, Stonebridge Farm)**
- Land at Park Farm, Congresbury **(Barratt Bristol, Land at Park Farm Congresbury)**
- Land at South Yanley Lane, Long Ashton **(Bob Durie)**
- Various parcels of land around Woodspring/Barrow Gurney/Long Ashton **(Del Piero Ltd)**
- Land at Stowey Road, Yatton **(Diverse Partnerships Yatton Ltd)**
- Land at Locking – BS24 7BE **(Dom Wells)**
- Even Keel, Backwell **(E Griffiths)**
- Land East of Clevedon **(Hallam Land)**
- Land east of Failand **(Harrow Estates)**
- Land west of Failand **(Hill Residential Ltd)**
- Land south of Bleadon Hill **(Innova Consulting Services)**
- Devil's Elbow Farm, Hillend, Locking **(John Reed)**
- Land south of Dark Lane, Backwell **(Kit Stokes)**
- Land north of Claverham **(Latimer Developments Limited)**



- Cox's Green, Wrington **(Lichfields Bristol)**
- Land to the east of Wrington **(LiveWest)**
- Land adjacent to B3133, Congresbury **(M7 Planning Ltd)**
- Land at Flax Bourton **(Mac Mic Strategic Land Flax Bourton)**
- Land at Parsonage Road (North of Festival Way), Long Ashton **(Marcus Plaw, Persimmon Homes)**
- Land to the north of Rectory Farm, Yatton **(Marcus Plaw, Persimmon Homes)**
- Land at East Portishead **(Marcus Plaw, Persimmon Homes)**
- Land at Haybow **(Mead Realisations Ltd)**
- Land at Lynchmead Farm, Weston-super-Mare **(Mead Realisations Ltd)**
- Land at Kewstoke Road, Norton **(Mead Realisations Ltd)**
- Land at Meeting House Lane, Cleeve **(Mead Realisations Ltd)**
- Castle Road, Clevedon **(Miles Estate)**
- Land south of the B3124, Clevedon **(Miles Estate)**
- Land at Batten's Farm, Nailsea **(Miller Homes Battens Farm)**
- Moss II Land, Locking Parklands **(Miller Homes Locking Parklands)**
- Land to the south of Knightcott Road, Banwell **(Mr Thomas Catling, Woodstock Homes)**
- Land to the north of Celtic Way, Bleadon **(Paul Taylor)**
- Land north of Caswell Lane, Portbury **(Richard Little)**
- Havyatt Green, Langford **(Rubix Land Ltd Havyatt Green Langford)**
- Land south of Clevedon Road, Portishead **(Strongvox Ltd)**
- Land north of Bridge Inn, Yatton **(Strongvox Ltd)**
- Land at Brinsea Road, Congresbury **(Strongvox Ltd)**
- Land at Cobthorn Farm, Congresbury **(Strongvox Ltd)**
- Land at The Alburys, Wrington **(Summerfield Homes Ltd)**
- Land at Stock Lane Farm, Langford **(University of Bristol)**
- Land to the West of Wyndhurst Farm, Langford **(University of Bristol)**
- Land south of Long Ashton **(University of Bristol)**
- Land between Banwell and the Bypass **(Verto Homes)**
- Land south of Greenhill Road, Sandford **(Waddeton Park Ltd Land south of Greenhill Road)**
- Land at Stowey Road, Yatton (also known as Land at Claverham Road) **(Wain Homes)**
- Land south of Laney's Drove **(Wall Holdings Ltd)**



- Land west of Butts Batch, Wrington **(Woodstock Homes Land west of Butts Batch)**
- Land to the north of Greenhill Road, Sandford **(Woodstock Homes)**

Two alternative employment sites promoted, that have already been considered by the council:

- Land east of Clevedon **(Hallam Land)**
- Land at Kenn Road Business Park, Clevedon **(Robert Hitchins Limited)**



LP6: Educational, sporting, leisure and community use allocations and Schedule 4

Policy LP6: Educational, sporting, leisure and community facilities and Schedule 4	
Number of representations received: 11	
Number of objections based on policy being unsound: 5	
Not positively prepared: 1 Not justified: 1 Not effective: 4 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Request for amendment to the Grove Farm residential allocation, and additional safeguarded site for educational use on land adjacent to West Leigh Infants school that is currently part of the Grove Farm residential allocation. **(Backwell PC and Nailsea PC)**	This parcel of land has been included within the Grove Farm allocation to ensure delivery of the indicative capacity is achievable. There is no evidence that the land is needed for educational use.
Concern that the evidence base documents that inform the plan are out of date. If updated studies were undertaken, then further allocations could be made for sports and playing fields. **(Sport England)**	The Playing Pitch Strategy and Built Sport Facility Strategy are considered robust and proportionate; both being produced at around the same time plan-making commenced. The strategic development locations of Wolvershill and Woodspring will include sports and leisure provision, as detailed in policies LP1 and LP2 respectively. The precise locations are not listed within Schedule 4 as they are yet to be confirmed through masterplanning and subsequent planning applications. As Sport England are aware, work has commenced to update the playing pitch strategy, and the built sport facility strategy will be refreshed in due course.
Nailsea and Backwell schools should be expanded, and additional locations identified on the policies map. **(Jeremy Blatchford, Nailsea Action Group)**	There is no evidence that Nailsea and Backwell secondary schools require expansion over the plan period. The proposed additional secondary schools at Yatton and Woodspring will ensure sufficient secondary school places.



	For primary schools, the need for additional places is addressed within Policy LP3 and referred to in the site-specific requirements for land east of Backwell and south of Nailsea. The precise locations of additional schools will be addressed through masterplanning.
There are difficulties in providing home to school transport for SEND pupils. **(Jeremy Blatchford)**	This policy relates to the provision of additional facilities. Where there is a need for home to school transport contributions they are secured through S106 agreements under the provision explained in Policy DP63.
Objection to the land south of Church Lane Backwell being identified for primary school playing fields as it is well used by residents for recreation, and playing fields would have a detrimental impact in respect of light pollution, noise and wildlife. **(Ruth Revell)**	Backwell C of E Junior School is constrained by development on all sides, and this land is safeguarded to allow for additional play space in future if needed. If this were to come forward other policies in the plan would continue to apply, to assess any detrimental impacts upon ecology and upon local residents.
Support/Other Comments:	**North Somerset Council Officer Response:**
Observation that primary and secondary school facilities should be designed to take account of current and future flood risk from all sources and a sequential approach should be followed. **(Environment Agency)**	Noted. This is covered by other policies in the plan.
Support for the use of planning obligations as a way of securing new or enhanced places for sport and leisure arising from the needs of new development. **(Sport England)**	This is agreed and also covered within Policy DP63.
Support for the principle of a new secondary school at Yatton, but object to the location proposed, suggesting it would be better placed at the north end of the village and not in the strategic gap. **(Mary Theresa Kingston)**	A detailed site search was undertaken to identify the most suitable location for this proposed school. The site-specific requirements address the respondents concerns in respect of the strategic gap, stating: *Layout, scale and siting of buildings must minimise adverse impacts on the strategic gap and the setting of nearby heritage assets, with particular regard to maintaining the primacy of Cadbury Hillfort within the landscape.*
Specific mitigations identified in the HEA that relate to the Yatton Secondary School site should be listed in the plan. **(Historic England)**	It is the council's position that the site-specific requirements adequately reflect the mitigations identified, and in any event include a requirement for a detailed heritage statement and a heritage-led masterplan.
Land next to the Village Hall, Kewstoke is identified as a replacement primary school site if needed. The land is within flood	This has been considered in the Flood Risk Sequential Test paper published as part of the evidence base which concluded:



zone 3. A comparison is needed to the existing primary school's location and whether the replacement school provides a better location in terms of flood risk. **(Environment Agency)**	*Given the extensive coverage of flood risk at Kewstoke there are not considered to be any sequentially preferable alternative sites that could accommodate the proposal in the Kewstoke area. Whilst an updated sequential assessment will be required at the point of planning application, the proposal will also be subject to the Exception Test that will ensure the development is safe for its lifetime.*
Land off Smallway Yatton secondary school site includes areas of flood zone 3 along the southern boundary. A sequential approach to flood risk will need to be applied on site.	Noted. This is a matter to be addressed through a planning application.
Requests for additional or improved swimming facilities. **(Jason Pitchers, Mike Coles)**	The Infrastructure Delivery Plan includes proposals for improvements to leisure centres.
Suggested modifications:	
Request for the deletion of a parcel of land adjacent to West Leigh Infants School from the Grove Farm residential allocation and the identification of the site for educational purposes with LGS status. **(Councillor Bridget Petty, Backwell PC and Nailsea PC)** Land should be set aside for a second site for Nailsea School, and Ravenswood School should be expanded. **(Jeremy Blatchford)** The Yatton Secondary School allocation should include specific reference to the landscape buffer suggested in the HEA within the site specific requirements. **(Historic England)** Deletion of the safeguarding on land south of Church Lane, Backwell for primary school playing fields. **(Ruth Revell)**	

LP7: Settlement boundaries and Schedule 5

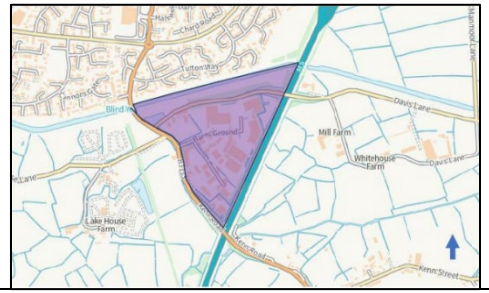
Policy LP7: Settlement boundaries and Schedule 5	
Number of representations received: 31	
Number of objections based on policy being unsound: 23	
Not positively prepared: 14 Not justified: 18 Not effective: 18 Not consistent with national policy: 20	
Number of objections based on policy being not legally compliant: 4	
Number of objections based on policy being not compliant with Duty to Co-operate: 5	
Main Issues Raised:	**North Somerset Council Officer Response:**
No evidence is provided to demonstrate that the Policies Map, Green Belt designation, and resulting settlement boundaries have been reviewed in light of overall requirements set within NPPF Paragraph 149 and specifically 149b). The criteria set out within the Settlement Boundary Review (October 2025), Policies Map and corresponding settlement boundaries should be updated following revisions to ensure these are consistent with national policy as required by NPPF Paragraph 36. **(Catesby Estates)**	Green Belt boundaries and settlement boundaries have been reviewed in accordance with the NPPF.
The tightly drawn nature of settlement boundaries reinforces the importance of ensuring a sufficient supply of deliverable housing allocations and an accurate assessment of windfall sites. In this regard, and as set out above, the concerns over housing delivery being met within the plan period and the move away from the flexible position allowed for within the adopted plan (under Policy CS32 for example) is likely to impede the delivery of a sufficient number of homes. The plan should include flexibility to allow development outside settlement boundaries in specific circumstances. Request that the Local Plan revises LP7 to allow for proportionate,	The plan has included a comprehensive review of settlement boundaries and has included proposed allocations within the settlement boundaries of towns and villages. The boundaries are less tightly drawn than in the current adopted plan and include curtilages of gardens, and certain uses on the edge of the settlements. Therefore the boundaries have been redrawn to allow for small scale windfall. As the plan meets its identified housing requirement there is no longer the need for a policy approach which allows sites to come forward adjacent to settlement boundaries.

well-designed growth in villages beyond the current settlement boundaries, ensuring rural areas can thrive and adapt to future needs. **(Diverse Partnerships, Yatton, Mead Realisations, Stephanie Fowler, Strongvox,Taylor Wimpey – Young wood Lane, Woodstock Homes Ltd, Oxford Plasma, Yatton (Kit Stokes)**	
Backwell has a Settlement Boundary (SB). Planning applications should be treated differently depending on whether they are inside or outside the SB. Four recent planning applications in the Parish, outside the SB, have been approved. The Local Plan now proposes changes to Backwell's SB to include the above and more. I do not understand the relevance of the SB. **(K Riches)**	The current Local Plan policy does allow sites of up to 25 dwellings to come forward adjacent to the settlement boundary of service villages, of which Backwell is one. Furthermore, as North Somerset Council cannot currently demonstrate a 5-year housing land supply the balance is tilted in favour of housing development where it can be demonstrated that the benefits outweigh any adverse impacts. As such larger housing schemes have been granted consent at some of the more sustainable villages.
To ensure that the Plan is sound, positively prepared and effective, draft Policy SP7 (and LP7) should be re-worded (and the Proposals Map amended) to also inset from the Green Belt other sites that do not contribute to the Green Belt objectives, and that therefore represent 'Grey Belt' land, specifically including Land to the East and West of Flax Bourton. **(Mac Mic Strategic Land).**	Land to the East and West of Flax Bourton is not proposed to be allocated in the Local Plan and therefore should not be removed from the Green Belt.
Support the principle of Settlement Boundaries providing guidance and certainty for Parishes and residents for the life of the Local Plan. Concerns in connection with Paragraph 2 of the policy which allows the extension of residential curtilages provided that it would not harm the character of the surrounding area of the living conditions of adjoining occupiers. It is felt this could lead to abuse of the settlement boundary and the certainty that settlement boundaries provide. **(Wrington Parish Council)**	The current adopted policy for settlement boundaries, SA2, already allows for this provision, but the policy is clear this is only permitted where it would not harm the character of the surrounding area or the amenities of the adjoining occupiers.
Object to the proposed amendments to the settlement boundary of Backwell, which are vastly extended to include the strategic allocations of Grove Farm and Land East of Backwell, but which also incorporate other undeveloped land which lies between those	It would not be possible to sensibly draw the settlement boundary around the proposed allocations and not include the incidental land between the proposed allocations and the existing built form of the settlement. This land however, mainly comprises of a recreation ground, primary school,

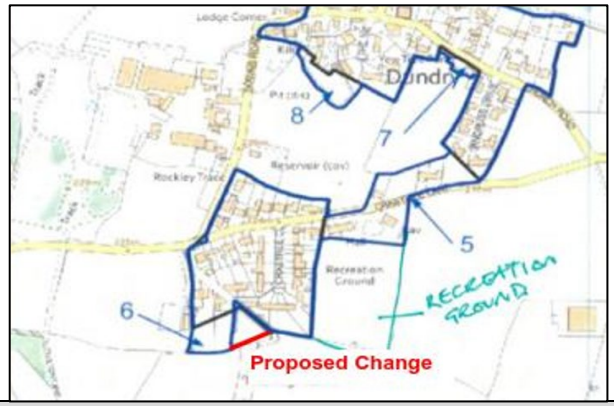


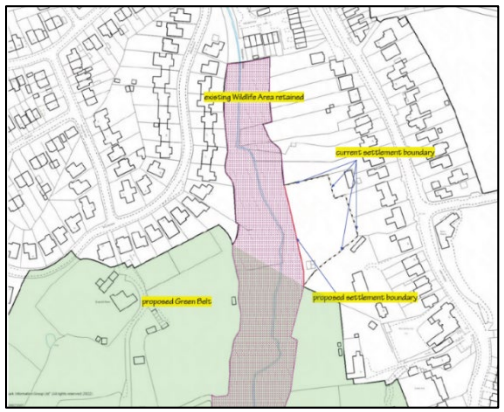
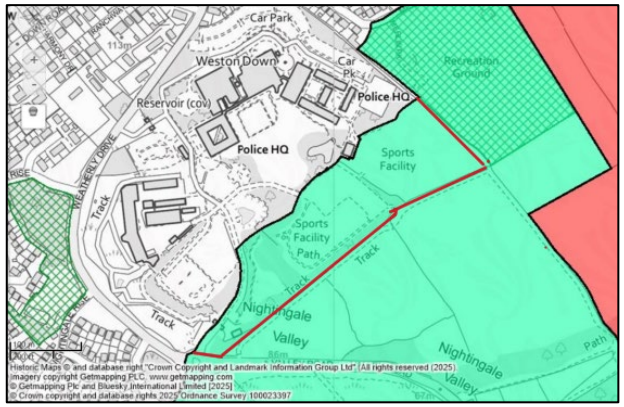
allocations and the existing built-up areas of the village. This approach is contrary to the methodology for settlement boundary review. The inclusion of these extra parcels of land could place additional pressure on undeveloped land for further residential development, which would result in denser development, a loss of important open spaces, visual breaks and recreational amenity spaces, to the detriment of the rural character of the village. **(Backwell PC, Nailsea TC, Flax Bourton PC, Brockley PC, Backwell RA, Nailsea Action Group)**	and secondary school playing fields and a park which are protected under other policies in the plan.
Backwell:	**North Somerset Council Officer Response:**
Settlement boundary for Backwell to be amended to include site allocations (if found sound) but should exclude any adjoining land which is not currently within the settlement boundary. **(Backwell PC, Nailsea TC, Flax Bourton PC, Brockley PC, Backwell RA, Nailsea Action Group)**	It would not be possible to draw the settlement boundary around the proposed allocations and not include the incidental land between the proposed allocations and the existing built form of the settlement. This land however, mainly comprises of a recreation ground, primary school, and secondary school playing fields and a park which are protected under other policies in the plan.
Banwell:	**North Somerset Council Officer Response:**



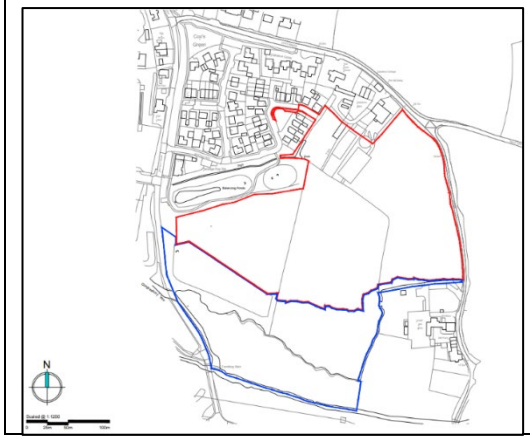
Land south of Knightcott Road which has planning consent for 27 dwellings should be included in the settlement boundary for Banwell. **(Woodstock Homes)** 	The land in question has a resolution to grant consent (24/P/0967/OUT) but does not have full planning consent at the current time. As such it is not proposed to extend the settlement boundary for Banwell around this site. This can be picked up as a modification to the policies map during the examination process if appropriate.
Clevedon:	**North Somerset Council Officer Response:**
Land at Kenn Road Business Park should be included in the settlement boundary for Clevedon to give greater certainty to the bringing forward of this previously allocated employment land and the inclusion of the Business Park within the settlement boundary would better represent the southern extent of the built-up area of the town. **(Robert Hitchins Limited)** 	The Kenn Road Business Park is separated from the main settlement of Clevedon by the river Yeo and open space. It is separate from the main built-up form of the settlement, and it is not appropriate for it to be included in the settlement boundary for Clevedon.

Dundry:	North Somerset Council Officer Response:
Objection to the exclusion of the promoted land at next to Andruss Drive, Dundry from the proposed settlement boundary. This site should be included as it represents a sustainable and logical extension to the existing settlement, supporting the Local Plan's objectives for growth and housing delivery. The settlement boundary has been too tightly drawn and exclude potential small scale development sites which are important for organic sustainable settlement growth and local builders. **(Clive JA Pulteney)** 	Criteria 12 of the Settlement Boundary Review Paper (Oct 2025) states that *"Playing fields, allotments, cemeteries and other open space which is located on the periphery of a settlement."* shouldn't be included within settlement boundaries. The area of land to the identified is a large open space which is not allocated for development and therefore should be excluded from the settlement boundary.
Adjustment to the settlment boundary at Dundry to include land between Lake Dene and the rear of properties at the end of Crabtree Close. The settlement boundary hsas been amended to include the large gardens at Lake Dene, Glenarth and The Salde and thereofre it should include this piece of land as well and remove it from the Green Belt. **(Holger Laux)**	The criteria for assessing settlement boundaries states that open areas such as orchards and paddocks which have a different character to garden areas (even if they are part of a larger curtilage) should not be included in the settlement boundary. This is a small field on the southern side of Dundry which does not form part of a curtilage of a property. Therefore, it should not be included in the settlement boundary of Dundry.

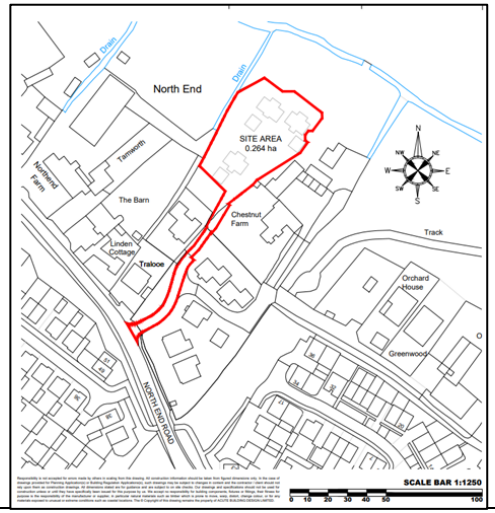
	
Nailsea:	
Tickenham Parish Council consider that the settlement boundary should not be amended to cater for the following proposed developments: Poplar Farm, Nailsea; Land off Pound Lane, Nailsea and Land north of Nailsea as these proposed developments intrude into the Green Belt. **(Tickenham Parish Council)**	As part of the review of settlement boundaries for the new Local Plan criteria were established by which to redraw the boundaries. The inclusion of proposed allocations within the settlement boundaries was one of the criteria set out in the Settlement Boundary Review Paper (Oct 2025).
Objection to sites around Nailsea being included in the revised settlement boundary for the town. **(Nailsea Action Group)**	As part of the review of settlement boundaries for the new Local Plan criteria were established by which to redraw the boundaries. The inclusion of proposed allocations within the settlement boundaries was one of the criteria set out in the Settlement Boundary Review Paper (Oct 2025).
Pill and Easton-in-Gordano:	
The settlement boundary should include part of the garden to number 40 Ham Green and continue to exclude the banks and floodplain of Markham Brook. The status of this long-established garden was confirmed in the Certificate of Lawful Development reference 16/P/0891/LDE dated 8 June 2016. This is consistent with the proposed removal of part of the lower garden to numbers 34 – 38 Ham Green which is shown on the Local Plan Proposals Map.	Criteria 9 of the Settlement Boundary Review Paper (Oct 2025) states that *"Open areas such as orchards and paddocks which have a different character to garden areas (even if they are part of a larger curtilage)"* shouldn't be included within settlement boundaries. The area of land to the rear of 40 Ham Green is of a different character to the main garden area and therefore should be excluded from the settlement boundary.

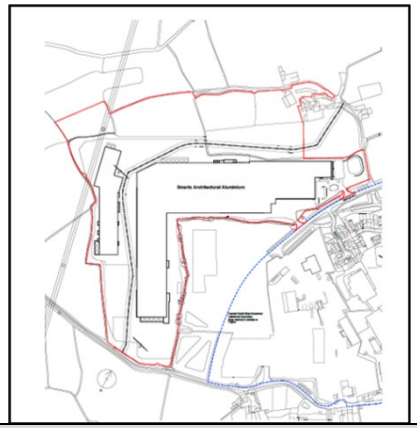
(Jerry Evans)  	
Portishead:	**North Somerset Council Officer Response:**
Request that the settlement boundary at Portishead be amended to include south of the Police Headquarters and that land is removed from the Green Belt. **(Avon and Somerset Constabulary)**  	Exceptional circumstances have not been adequately demonstrated to justify the release of land at the Avon and Somerset Police Headquarters from the Green Belt. This land does not meet the criteria for inclusion within a settlement boundary as set out in the Settlement Boundary Review Paper (Oct 2025).

Objection to Tower Farm Site and settlement boundary extending around the proposed allocation. **(Lisa Hughes)**	As part of the review of settlement boundaries for the new Local Plan criteria were established by which to redraw the boundaries. The inclusion of proposed allocations within the settlement boundaries was one of the criteria set out in the Settlement Boundary Review Paper (Oct 2025).
Tickenham:	**North Somerset Council Officer Response:**
Only part of Tickenham will be inset within the settlement boundary. Over 100 dwellings within the parish of Tickenham will lie outside of the proposed settlement boundary and in the Green Belt. Tickenham Parish Council are satisfied with the location of the settlement boundary for Tickenham**. (Tickenham Parish Council)**	This is correct. The main built form of Tickenham village will have a settlement boundary and be inset from the Green Belt. Other properties within Tickenham Parish are widely dispersed and therefore do not warrant having a settlement boundary.
Land at Tickenham (south of the Pippins) should be included within a revised settlement boundary so to allow for sensitive infill development to be delivered. Such development would contribute to the sustainability of the village. It would also helpfully bolster the Council's 5 year housing land supply**. (Mr Paul Griffin)** 	Criteria 12 of the Settlement Boundary Review Paper (Oct 2025) states that *"Playing fields, allotments, cemeteries and other open space which is located on the periphery of a settlement."* shouldn't be included within settlement boundaries. The area of land to the identified is a large open space which is not allocated for development and therefore should be excluded from the settlement boundary.
Weston-super-Mare:	**North Somerset Council Officer Response:**
The land south of Mannock Gardens and Farnborough Road (phase 12a) which is covered by the extant outline permission ref 13/P/0997/OT2 for Locking Parklands is shown to lie outside the	Agreed. The settlement boundary should be redrawn to run along the edge of the A371 and include the proposed Local Green Space. This amendment will be put forward as a proposed change at submission of the

settlement boundary. Whilst this land is proposed to be designated as a local green space under Policy LP15, this will need to be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services in line with the NPPF. The green space to the south of Farnborough Road will include informal and formal recreation set within the parkland setting so the designation must allow for active uses. Therefore, we propose for the settlement boundary to be reviewed to include the land south of Mannock Gardens and Farnborough Road. **(Homes England)**	plan.
Objection to the settlement boundary being extended at Weston-super-Mare to include the proposed allocation at Leighton Crescent and the existing housing at Hillcote. (**Jean Howard)**	The Settlement Boundary Review Paper (Oct 2025) identifies that proposed allocations should be included within settlement boundaries. As the Leighton Crescent allocation is within a gap between Weston built up area and Hillcote it makes sense to include Hillcote in the settlement boundary of Weston-super-Mare.
Wrington:	
Wrington's Settlement Boundary should be extended to include the land at Cox's Green as this is a sustainable location for development outside of the Green Belt that is suitable and available. **(Lichfields Bristol)** 	This is not a proposed allocation in the local plan and does not meet the criteria set out in the Settlement Boundary Review Paper (Oct 2025) to be included in the settlement boundary of Wrington.

Land to the East of Wrington should be allocated and the settlement boundary adjusted to include it and the Policies Map and Schedule 5 adjusted accordingly. The site has the potential for the phased delivery of residential development with the potential provision of enhanced recreational facilities and substantial provision of green infrastructure to support the enhancement of the existing village edge. Initial masterplanning indicated the site has capacity for between 150-180 dwellings across the whole site area. It would support appropriate policy compliant level of affordable housing and range of housing mix and types. **(LiveWest)** 	This is not a proposed allocation in the local plan and does not meet the criteria set out in the Settlement Boundary Review Paper (Oct 2025) to be included in the settlement boundary of Wrington.

Settlement boundary at Wrington should be extended to include Land at Butts Batch, Wrington **(Woodstock Homes).** 	This is not a proposed allocation in the local plan and does not meet the criteria set out in the Settlement Boundary Review Paper (Oct 2025) to be included in the settlement boundary of Wrington.
Yatton:	**North Somerset Council Officer Response:**
Request to include land by Chestnut Farm in Yatton within the settlement boundary as its exclusion is not justified on Flood Risk grounds. **(Chestnut Property Developments)** 	This site has been excluded from being within the settlement boundary of Yatton because it does not conform with the settlement boundary methodology criteria for being included within the settlement boundary. The site is on the edge of the settlement and does not form part of a curtilage of a dwelling. It is an open area of land different in character to garden areas and as such should not be included in the settlement boundary as per criteria 9 of the methodology. It is noted there is a live application on this site for 3 dwellings (26/P/0257/FUL) which is yet to be determined.

Land within with ownership of Smart Systems, Yatton should all be included in the settlement boundary of Yatton, or at least land should be included to reflect planning consent 21/P/1999/FUL. **(Smart Systems, Yatton)** 	The settlement boundary has been extended to incorporate the Smart Systems employment site within the settlement boundary of Yatton as per criteria 7 of the methodology. The revised boundary includes the built-up area of the site. However, it is acknowledged that a small additional area of land to the north which is now car parking and part of the operational part of the site due to planning consent 21/P/1999/FUL should also be included in the settlement boundary as this amendment will be put forward as a proposed change at submission of the plan. It would be contrary to criteria 9 and 12 of the Settlement Boundary Review Paper (Oct 2025) to include the additional greenfield areas within the ownership of Smart Systems as suggested.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support for the exclusion on the green space and fields next to the recycling centre from the settlement boundary as these are well used green spaces. **(Jessica King and Bridget Petty)**	Comment noted.
Agreement that the Railway line makes a suitable village boundary for Backwell. **(Bridget Petty)**	Comment noted.
Agreement to the boundary edge around Grove Farm site in Backwell so no further expansion takes place as this site has already been given permission. **(Bridget Petty)**	Comment noted.
Support the inclusion of the Wolvershill strategic allocation site within settlement boundaries. This reflects its identity as an extension to	Comment noted.

Weston-super-Mare and importance in delivering the ambitions of the plan. Furthermore, it is noted that the justification text sets out that settlement boundaries can be reviewed and adjusted via Local Plan reviews and/or Neighbourhood Development Plans, which is welcomed. This allows future Development Plan Documents to respond to changes in circumstance/requirements as necessary. **(Bellway Homes)**	
The maintaining of the village and town boundaries, other than those already selected for development, is crucial to prevent the sprawl of development and disconnected housing estates. **(R Storrar)**	Comment noted.
Suggested modifications:	
The plan should include flexibility to allow development outside settlement boundaries in specific circumstances. **(Diverse Partnerships, Yatton, Mead Realisations, Stephanie Fowler, Strongvox,Taylor Wimpey – Young wood Lane, Woodstock Homes Ltd, Oxford Plasma, Yatton (Kit Stokes)** Land south of Knightcott Road which has planning consent for 27 dwellings should be included in the settlement boundary for Banwell. **(Woodstock Homes)** Land at Kenn Road Business Park should be included in the settlement boundary for Clevedon. **(Robert Hitchins Ltd)** Land at next to Andruss Drive, Dundry should be included in the settlement boundary for Dundry. **(Clive JA Pulteney)** Land between Lake Dene and the rear of properties at the end of Crabtree Close should be included in the settlement boundary for Dundry **(Holger Laux)** Settlement boundary for Nailsea should not be amended to cater for the following proposed developments: Poplar Farm, Nailsea; Land off Pound Lane, Nailsea and Land north of Nailsea as these proposed developments intrude into the Green Belt. **(Tickenham Parish Council, Nailsea Action Group)**	



The settlement boundary should include part of the garden to number 40 Ham Green at Pill and Easton-in-Gordano
(Jerry Evans)

The settlement boundary at Portishead should be amended to include south of the Police Headquarters and that land is removed from the Green Belt.
(Avon and Somerset Constabulary)

Land at Tickenham (south of the Pippins) should be included within a revised settlement boundary for Tickenham.
(Mr Paul Griffin)

The settlement boundary for Locking Parklands should be reviewed to include the land south of Mannock Gardens and Farnborough Road.
(Homes England)

Wrington's Settlement Boundary should be extended to include the land at Cox's Green.
(Lichfields)

Land to the East of Wrington should be allocated and the settlement boundary adjusted to include it.
(LiveWest)

Settlement boundary at Wrington should be extended to include Land at Butts Batch, Wrington.
(Woodstock Homes).

Land by Chestnut Farm in Yatton should be included within the settlement boundary.
(Chestnut Property Developments)

Land within with ownership of Smart Systems, Yatton should all be included in the settlement boundary of Yatton, or at least land should be included to reflect planning consent 21/P/1999/FUL.
(Smart Systems, Yatton)



LP8: Town Centre Hierarchy and Schedule 6

Policy LP8: Town Centre Hierarchy and Schedule 6	
Number of representations received: 5	
Number of objections based on policy being unsound: 1	
Not positively prepared: 1 Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
A sequential approach should be followed as in Policy DP9 and DP28. Follow sequential approach for flood risk both today and with climate change. Flood resilience measures to be included in development design **(Environment Agency)**	The plan should be read as a whole and relevant policies applied accordingly.
Request that the final boundaries on the policies map are checked to reflect the extant planning permissions and pending RMs for phase 8/10 at Locking Parklands. **(Homes England)**	Agreed – boundaries for the Local Centre at Locking Parklands (covered by DP26: Local Centres) will be amended to accurately reflect planning consents.
Concern that the proposed residential allocations are distant from the town centre and would create a lop-sided settlement layout, preventing the town centre from being accessible. The town centre boundary has sufficient spare land and under-used accommodation to provide the additional space required to serve the increased population. The policy states that additional retail locations must be accessible by walking, cycling and public transport, Nailsea does not meet this standard. **(Nailsea Action Group)**	Other policies in the Local Plan aim to ensure connectivity from new housing allocations to the main town centre to ensure accessibility to services and facilities by sustainable modes of travel.



Support/Other Comments:	**North Somerset Council Officer Response:**
It seems that the Council has sought to identify a realistic and range of options to accommodate the increased housing requirement. **(Burrington Parish Council)**	Comment noted.
Support policy LP8. **(Phoenix Life Ltd)**	Support welcomed.
Support the policy and identified proposed local/village centre for Locking Parklands. **(Homes England)**	Support welcomed.
Suggested modifications:	
Request that the final boundaries on the polices map reflect the extant and pending applications for phase 8 at Locking Parklands. **(Homes England)**	



LP9: Extent of the Green Belt

Policy LP9: Extent of the Green Belt	
Number of representations received: 44	
Number of objections based on policy being unsound: 24	
Not positively prepared: 14 Not justified: 19 Not effective: 20 Not consistent with national policy: 16	
Number of objections based on policy being not legally compliant:12	
Number of objections based on policy being not compliant with Duty to Co-operate: 10	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern regarding development encroaching onto the countryside and causing coalescence between settlements e.g. between Yatton and Claverham. Development should be focussed at strategic locations/site where it can be supported by infrastructure, not around villages. Suggestion for new Green Belt between Yatton and Claverham. **(Adam Jeffes)**	There are no Exceptional Circumstances to justify extending the Green Belt to the area between Yatton and Claverham.
Objection to the insetting of villages within the Green Belt as it removes protection from development. e.g. Felton. **(Amanda Lindley)**	Villages which have been inset do not contribute to the openness of the Green Belt and therefore should not be included in the Green Belt as required by paragraph 150 of the NPPF. However, these villages do have settlement boundaries which means development beyond the settlement boundary which would still be in the Green Belt is restricted.
Objection to the approach of insetting villages within tightly drawn boundaries which removes any potential for growth. This rigid policy fails to recognise the need for flexibility and proportionate development that supports rural communities. Rather than imposing absolute limits, the Local Plan should consider rounding off villages to allow them to grow in a sustainable and sensitive manner. **(Kit Stokes)**	All settlement boundaries have been reviewed as part of the local plan process and allocation included within the settlement boundaries. It would not be appropriate or necessary to include large areas of unallocated land in the boundaries of settlements.



Objections to the release of Land East of Backwell from the Green Belt for residential development. **(Backwell RA, Nailsea Action Group)**	Due to the increase in North Somerset's housing requirement through the introduction of the mandatory standard method in the NPPF (Dec 2024) North Somerset cannot sustainably meet its housing requirement on sites outside the Green Belt. This constitutes exceptional circumstances and, in such instances, the NPPF directs local authorities to review their Green Belt boundaries and propose alterations to meet their housing need in full. As such North Somerset have undertaken a two stage Green Belt review and released land from the Green Belt for housing allocations.
Felton Common is Green Belt but the Local Plan should specifically mention it as a Common and a local Nature Reserve and Site of Nature Conservation Interest and include a specific policy to safeguard it as a Common. **(Winford Parish Council)**	Other policies in the plan provide protection for nature reserves, areas of ecological importance and areas of open space such as DP35: Nature Conservation, DP34: Green Infrastructure and DP52: Protection of open space and recreation.
The new Green Belt proposed south of Nailsea and west of Backwell is insufficient to offset the Green Belt lost as a consequence of changes at the Airport and from planned housing developments. This proposed Green Belt should be extended further. If the Inspector does not agree to the extension of the green belt, the designation of 'strategic gap' between Nailsea and Backwell should be restored. This area should not be without any designation, thereby attracting unwanted speculative applications from developers. **(Backwell RA & Nailsea Action Group)**	Exceptional circumstances exist to establish an extension to the Green Belt at Nailsea and Backwell. The exceptional circumstances include the scale of proposed development at Nailsea and Backwell which risks the merger of settlements, the need to secure the longer-term planning for the area and preserve openness, and the need for a stronger more permanent designation than the strategic gap to properly protect the openness of the area. A larger option was considered but did not accord with the exceptional circumstance criteria as set out in para 144 of the NPPF. It is agreed that the Strategic Gap designation should remain if new Green Belt is not established.
Query whether proposals at Bristol Airport require a further release of land from the Green Belt to accommodate the operational requirements of the expansion to 15 mppa. **(Burrington Parish Council)**	The Local Plan does not propose to release land from the Green Belt to accommodate the airports aspirations for expansion to 15mppa. The extent shown on the policies map reflects the extant consent for the operational area that aligns with growth to 12mppa.
Concern over impact on ecology/wildlife/habitats from releasing land from the Green Belt **(C Wheeler, K Baker)**	This concern is recognised and the Local Plan puts significant measures in place to mitigate against the impacts of development on ecology.
Objection to the removal of sites at Pill and Easton-in-Gordano from the Green Belt for residential development as there are not exceptional circumstances to justify this release as all other	Having taken account of the criteria set out in paragraph 147 of the NPPF (2024) it is clear that exceptional circumstances exist to justify changes to Green Belt boundaries to meet the housing needs for North Somerset over



alternative sites have not been explored. It equates to 80% of the accessible green belt around the community being lost and creates urban sprawl with the port. **(Easton-in-Gordano Parish Council, Pill & Easton-in-Gordano Parish Council, Justin Saunders, Kevin Payne)**	the plan period. This is set out in the Green Belt Background Paper which forms part of the evidence base for the Local Plan.
Objection to the proposed extension to the Green Belt at Nailsea and Backwell which would alter the approach to Green Belt designation in this area only (between Nailsea and Backwell), introducing an irregularity with an entirely different purpose, well removed from checking the unrestricted sprawl of Bristol and would frustrate sustainable housing development. **(Gleeson Land)**	Exceptional circumstances exist to establish an extension to the Green Belt at Nailsea and Backwell. The exceptional circumstances include the scale of proposed development at Nailsea and Backwell which risks the merger of settlements, the need to secure the longer-term planning for the area and preserve openness, and the need for a stronger more permanent designation than the strategic gap to properly protect the openness of the area.
Concern that there is inconsistency between the Stage 1 Strategic Green Belt Assessment and the NSC process for prioritising the sites for development within the Local Plan making process. It is not clear why some sites are included whilst others aren't. **(Green Belt Working Party for the Parish Councils of Long Ashton and Dundry)**	The Strategic Green Belt Assessment is not a decision-making document. It is not its role or function to propose where release of Green Belt land should take place. The Green Belt assessments form part of a wider evidence base which informs the selection of the proposed housing allocations, along with other planning considerations.
The Council need to undertake a full Green Belt review and allocate more sites for housing, including possibly some more sites within the Green Belt. **(Home Builders Federation)**	The council has undertaken a Stage 1 and Stage 2 Green Belt Review as part of the evidence base to support the Local Plan and these were published alongside the Pre-submission plan for consultation.
Objection to the Tower Farm and Black Rock sites at Portishead being removed from the Green Belt due to the environmental importance of the fields that act as an essential buffer to Weston Big Wood, a SSSI. **(L Johnston, Mr Waite, YACWAG)**	The site-specific requirements for the Tower Farm and Black Rock sites as set out in Schedule 1 recognise the ecological importance of Weston Big Wood and require ecological buffers between the woods and any development.
Supportive in principle of the Council's review and the proposed release of land from the Green Belt elsewhere in the authority area, in order to facilitate residential development. Much of this land represents 'grey belt' and in any event does not contribute strongly to any of the five purposes of Green Belt designation, such that it should not remain part of the Green Belt.	If land is identified as potential grey belt this does not mean it should automatically be released from the Green Belt. Land should only be released from the Green Belt if there are exceptional circumstances to justify that release.



(Stephanie Fowler, Strongvox Ltd, Taylor Wimpey - Youngwood Lane, Nailsea)	
Disagree with the Stage 2 Green Belt Assessment in relation to Land north of Nailsea or Land off Pound Lane. We consider that criteria (a), (b) and (c) should all be classified as strong and that these areas of land should not be defined as grey belt and should remain in the Green Belt. **(Tickenham Parish Council)**	The assessment of parcels in the Stage 2 Green Belt Assessment has been undertaken in accordance with the Planning Practice Guidance for Green Belt and its conclusions are robust.
Waddeton Park Limited strongly supports the allocation of Land at Pill Road and its release from the Green Belt however has some comments regarding the site-specific requirements relating to capacity, potential provision of a care home, removal of the requirement of an active travel crossing over Markham Brook. **(Waddeton Park Limited)**	Support for allocation noted and requests for changes to the site-specific requirements are picked up in responses to Schedule 1.
Specific request to release sites from the Green Belt:	
Request to remove Land East of Wrington from the Green Belt for housing development. **(LiveWest).**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such this site has not been allocated and therefore should not be removed from the Green Belt.
Request to release land from the Green Belt to accommodate residential development at the following locations: • Land at East Portishead • North of Festival Way, Long Ashton **(Persimmon Homes)**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such this site has not been allocated and therefore should not be removed from the Green Belt.
Request that Land south of Clevedon Road, Portishead be released from the Green Belt for housing development. **(Strongvox Ltd)**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such this site has not been allocated and therefore should not be removed from the Green Belt.
Request to release land at Shipway Farm adjacent to Royal Portbury Dock from the Green Belt to support operations at the dock. **(The Bristol Port Company)**	Exceptional circumstances have not been adequately demonstrated to justify the release of land in the Green Belt at Royal Portbury Dock.
Request to remove land from the Green Belt to the north-east of Colliters Way to facilitate the Epic development which has planning	Land north of Colliters way does not have planning consent and it is not a proposed allocation. As such there is no justification for removing it from



consent. **(Epic Systems)**	the Green Belt.
Request to remove land from the Green Belt at Portishead to allow for the expansion of Avon and Somerset Police Headquarters **(Avon and Somerset Constabulary)**	Exceptional circumstances have not been adequately demonstrated to justify the release of land at the Avon and Somerset Police Headquarters from the Green Belt.
Request to remove parcels of land around Barrow Hospital from the Green Belt as they should be considered PDL/grey belt. **(Del Piero Ltd)**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such this site has not been allocated and therefore should not be removed from the Green Belt.
Bristol Airport requests that the Green Belt Inset is extended to reflect our adopted Master Plan land requirements to accommodate longer-term development up to 15mppa. **(Bristol Airport)**	The release of land from the Green Belt at Bristol Airport reflects the consented growth to 12 million passengers per annum. The airport's masterplan and planning application for further growth is recognised but does not have any formal planning status and as such it would not be appropriate for further Green Belt releases at the airport.
Support/Other Comments:	**North Somerset Council Officer Response:**
The identification of Land north of Colliters Way as a release from the Green Belt is supported. The land is considered to be Grey Belt land as defined by the NPPF. In accordance with NPPF paragraph 148 the site should therefore be given priority. **(Barratt Bristol - Land at Colliters Way)**	Comment noted.
Bellway agree that exceptional circumstances exist to review and amend the Green Belt boundary to ensure North Somerset can meet its housing need in full. Due to unmet housing need, it may be necessary for the Council to further review boundaries in this policy, as suitable / necessary. **(Bellway Homes Ltd)**	Comment noted.
The Council has sought to identify a realistic and as wide as possible range of options to accommodate the increased housing requirement. **(Burrington Parish Council)**	Comment noted.
Support for the proposed extension to the Green Belt between Nailsea and Backwell to safeguard the wildlife corridor and also to maintain the separation of the two communities.	Support welcomed.



(David Sheridan, Yatton Parish Council)	
Support for the release of Green Belt and housing near to existing main towns and large villages and services. **(Kath Scargill)**	Comment noted.
Supportive of the proposed release of land from the Green Belt at Land at Lodway Farm, Pill and Easton-in-Gordano in order to facilitate residential development. **(Strongvox Ltd)**	Comment noted.
Suggested modifications:	
Listed above within main issues raised.	

LP10: Strategic gaps

Policy LP10 Strategic gaps	
Number of representations received: 31	
Number of objections based on policy being unsound: 25	
Not positively prepared: 11 Not justified: 15 Not effective: 22 Not consistent with national policy: 16	
Number of objections based on policy being not legally compliant: 8	
Number of objections based on policy being not compliant with Duty to Co-operate: 7	
Main Issues Raised:	**North Somerset Council Officer Response:**
The existing Strategic Gap between Yatton and Congresbury should be retained. A new Strategic Gap, between Yatton and Kenn, should be designated to protect land east of the B3133 near North End Yatton from development, as well as the corridor of land either side of the B3133 towards Clevedon. **(Yatton Parish Council)**	The land between the settlement limits of Kenn and Yatton as defined in the emerging Local Plan is at least 1.6km at the narrowest point. That is much wider than the narrowest width of any existing strategic gap between settlements in North Somerset. SHLAA sites received suggest that there is little pressure for development on the land between the settlements.
Note the removal of the strategic gap between Nailsea and Backwell (it is proposed to extend the Green Belt between these settlements). The long-standing strategic gap between Nailsea and Backwell is treasured by each community; any effort to merge the two towns by its removal will be strongly resisted. Should the Inspector not support the extension of the Green Belt, the Nailsea/Backwell strategic gap should be reinstated to safeguard the settlements from coalescence. **(Backwell PC NailseaTC Flax Bourton PC BrockleyPC Backwell RA Nailsea Action Group)**	The justification to Policy LP10 states that if the Green Belt is not extended as proposed, then a revised strategic gap should be retained. The revised strategic gap would need to be drawn with regard to the relevant criteria.
Strong objection to designation of land north of Greenhill Road, Sandford, as a strategic green gap. It could deliver 37 homes, without compromising the essential separation between Sandford and Churchill. Strategic gaps are unnecessary and unjustified. The	The council's Nov 2023 Strategic Gaps Background Paper appropriately explains why a strategic gap between Sandford and Churchill is needed. Policy LP10 does not duplicate existing countryside and development

NPPF does not specifically promote them. The NPPF 2024 introduced grey belt criteria. The strategic gap has no such criteria. The Council's 12 criteria for strategic gaps reflect general characteristics that apply to much rural land adjacent to villages. **(Woodstock Homes Ltd)**	control policies. The justification to the policy indicates that "*reliance on countryside policies alone would be unlikely to provide sufficient protection against the reduction or loss of such important gaps to development, particularly in the absence of a clear landscape harm. Without the added protection of strategic gap designation, there is a significant risk that incremental development would eventually erode the gaps, with the detrimental effects on settlement identity and character".* The justification accurately indicates that strategic gaps have a broad similarity to some of the purposes of Green Belts, by helping to prevent the merging of settlements for example, but they are a different designation and concepts such as grey belt do not apply to them. Strategic gaps are not designated within Green Belt. In her Report the Inspector to adopted North Somerset Site Allocations Plan examination found the criteria for defining strategic gaps to be "reasonable". She found that Plan to be sound regarding strategic gaps.
The provision of Strategic Gaps is accepted in principle. However, it is felt that there is greater need for flexibility to allow provision of community facilities and other active Green Infrastructure uses that will provide beneficial amenity for those communities adjoining strategic gaps. **(Ainscough Strategic Land, Wain Estates, Bellway Homes Ltd, Bloor Homes South West)**	The policy wording does have sufficient flexibility to allow provision of green infrastructure. For example the 1st criterion does not prevent development which would not significantly adversely affect the open or undeveloped character of the gap. Subject to siting and design, facilities like play areas, recreation grounds, playing fields, allotments and other forms of green infrastructure might be acceptable. Each application will be assessed on its merits against the criteria. The policy wording provides sufficient flexibility to allow certain uses within Strategic Gaps whilst preventing the coalescence of settlements.
Agree with maintaining the strategic gap between Yatton and Congresbury. However, development here would also negatively impact ecologically, and harm the North Somerset and Mendip Bats through disturbance of bat foraging and commuting. **(YACWAG)**	The Plan contains policies on nature conservation, such as DP35 for example, which adequately cover protection for SAC bats. There is no need to refer to this issue in a policy on strategic gaps.
Respondents felt there is a need for a strategic gap to be introduced between urban Weston-super-Mare and the rural parish of Bleadon. They raise points against the NSC response that this is not	Para 2.42 of the Council's Strategic Gaps Background Paper October 2025 states: "*Page 9 of the council's November 2023 Strategic Gaps Background Paper explains why a strategic gap is not considered*

necessary due to the topography and geology of the local area and feel that there is significant risk that incremental development will erode the countryside, merging Bleadon area with Weston-super-Mare with hugely detrimental effect on Bleadon settlement identity and character. **(Bleadon Parish Council, David Davies)**	*appropriate between Bleadon and Weston super Mare (Weston). It states: A strategic gap is not appropriate. Having regard to SHLAA sites received and taking account of the generally relatively steeply sloping terrain between the settlements, it is considered that there is not likely to be development pressure leading towards potential coalescence of the settlements. Also, the relatively sensitive nature of the landscape, taking account of the topography and views, would suggest that if significant development was proposed there could well be a landscape reason for refusal."*
Query how will the council ensure that the strategic gaps are protected. **(P Watkins)**	Protection will be through use of Policy LP10 in development management. The policy prevents development unless specified criteria are met.
No objection to the Yatton and Congresbury strategic gap, but it does reinforce the presumption that the settlements' proportionate growth should be northwest of Yatton and southeast and east of Congresbury. **(Pegasus Group)**	The strategic gap mainly affects land to the south of Yatton and to the north west of Congresbury, but that leaves a number of areas on other sides of these settlements unaffected by it.
Strategic gaps are inconsistent with sustainable development principles and national policy. The Council's justification for retaining them is inadequate and fails to have regard to the Site Allocations Plan Inspector's comments. If retained, they should be substantially reduced, particularly in locations like Weston-super-Mare, where they are prejudicial to delivering growth in accordance with the spatial strategy. In particular, specific request is made to remove land South of Laney's Drove to the north west of Elm Grove Nurseries which does not make an essential contribution to maintaining separation from the wider urban area of Weston-super-Mare. **(Wall Holdings Ltd)**	The Inspector found the criteria for defining strategic gaps to be "reasonable". She found the SAP (Site Allocations Plan) to be sound regarding strategic gaps. (see para 99-101 of the Report). The Council has considered the matter and decided to continue with strategic gaps. The justification for strategic gaps is set out in the justification for Policy LP10 and in the Strategic Gaps Background Paper November 2023 . This is considered to be thorough and appropriate. Paras 6.27- 6.36 of the Background Paper refer to the strategic gap between Weston super Mare and Locking, including land at Laney's Drove (the purple hatched "Site 1" in para 6.27). The assessment of that site against criteria for defining strategic gaps is documented and concludes (in para 6.33) that the grassland at Site 1 should remain in the strategic gap.
There is a resolution to grant outline consent on 4.6 acres at Land to the South of Knightcott Road for up to 27 dwellings (24/P/0967/OUT). There is still further opportunity to design a scheme for 62 additional units using the remaining 17 acres, that	Noted. This is listed as an omission site under Policy LP5.



continues the principles of the gap between Banwell and Knightcott, encouraging views up towards Banwell Hill. **(Woodstock Homes)**	
Request to remove 1.95 hectares of land south of Greenhill Road, Sandford from the proposed strategic gap for Sandford and Churchill as it is considered to be a suitable and sustainable location to deliver residential development. The October 2025 Strategic Gaps Background Paper gives inadequate justification. **(Waddeton Park Ltd (Land south of Greenhill Road))**	As indicated in para 2.34 of the Strategic Gaps Background Paper October 2025 the land south of Greenhill Road, (fields east of Sandford, between the properties Heatherdale and The Paddocks) is an important part of the proposed strategic gap. It is part of the partly undeveloped road frontage between Sandford and Churchill along the A368. Its loss to development would reduce that, and result in continuous development straddling the A368 between Well Croft on the south side near Sandford, and Sandmead Springs and Pye Cottage near Churchill on the north side. Then it would only take development of the western field between 86 Greenhill Road and Well Croft, plus two fields west of Hilliers Lane to cause coalescence of the settlements.
Support the proposed removal of much of the western field (of Gladman's land interest) at Land off Elm Grove, Locking, from the strategic gap identified between Weston-Super-Mare, Locking and Parklands Village. However, the irregular shaped remainder of the western field should also be removed to allow a comprehensive development on the wider site, or the housing allocation boundary should be extended slightly northwards to accommodate a sliver of the developable area on the western field. **(Gladman Developments)**	The proposed change to the strategic gap to exclude part of the western field is explained in section 5 of the Strategic Gaps Background Paper October 2025 . It indicates that the change was made in the face of great difficulty of meeting the increased housing target, particularly given hard constraints like flood zones. Para 5.2 states: "*In earlier versions of the emerging Plan the Council had already proposed a housing allocation on adjoining, non-strategic gap land to the east, so this is effectively a westward extension of that, onto land in the strategic gap. In making this change the council has had regard to various factors, set out in the justification below, including advantages of the site in terms of sustainability of location, low flood liability and minimal landscape impact".* Para 5.3 includes*: Unlike a number of SHLLA sites in the vicinity, this site (the part proposed for removal from the strategic gap) is not on land at risk of flooding."* The northern part of the western field is zone 3a flood zone, so that part was excluded from the area proposed for removal from the strategic gap and allocation for housing.
The Council need to allocate more sites for housing, including possibly some within Strategic Gaps.	The Council has met its housing requirement with minimal loss of land which is currently, or proposed as, strategic gap. That is considered



(Home Builders Federation)	reasonable.
Support for the policy approach as whole. However, land at Stonebridge Farm, which is a suitable development site, should be excluded from the Strategic Gap. It includes a permitted existing area of caravan storage. The site is brownfield, in a sustainable location and can be delivered in the short term. **(Ainscough Strategic Land (Stonebridge Farm))**	It would not be appropriate to exclude the suggested land from the proposed strategic gap between Banwell and the Wolvershill strategic location. To exclude it would significantly reduce the width of this part of the strategic gap. The sense of the gap would also be adversely affected, if the land is subsequently developed for housing or other buildings.
Retention of the site "Land adjacent B3133, Congresbury", site within the Yatton – Congresbury Strategic Gap is claimed to be erroneous and can no longer be justified, in light of the Council's decision to allocate some of the Strategic Gap (south of Yatton and immediately west of the M7 site) as the location for a new secondary school in this Draft Local Plan. The Strategic Gap should be amended to exclude both this site and the secondary school site. **(M7 Planning Ltd)**	It is expected that the layout of the proposed Yatton secondary school will minimise impact on the strategic gap. The Local Plan's Schedule 4 Community facilities (p.344) includes: *"Layout, scale and siting of buildings must minimise adverse impacts on the strategic gap and the setting of nearby heritage assets, with particular regard to maintaining the primacy of Cadbury Hillfort within the landscape".* This is likely to mean that school playing fields, and similar uses likely to maintain the open or undeveloped character of the gap, would be appropriately placed in a retained area of strategic gap. The impact on the strategic gap will only fully be determined when a planning application is submitted for the school. However, a good layout could minimise the impact and complement the M7 site by siting playing fields or similar relatively open uses opposite it, on the west side of the B3133. This will add to the openness of the M7 site and aid the sense of visual separation of the settlements. The M7 site will play an important role in contributing to this sense and also in helping maintain the actual and perceived distance between the settlements. With the currently drawn strategic gap the gap between the settlements' limits is about 275m, near the B3133. If the M7 site was to be removed from the strategic gap and developed with buildings, the gap between the settlements' limits would be reduced to about 145m.
The policy is not consistent with national policy. Paragraph 11 of the NPPF requires plans to 'align growth and infrastructure'. To support the growth identified in the Local Plan, Wessex Water needs to plan and deliver new infrastructure. The Strategic Gap policy as currently	The policy applies to all land uses, and does not identify exceptions, which is the fairest approach. Any future applications for essential infrastructure will be considered on their merits and determined accordingly.



worded may prevent us from gaining planning consent for essential infrastructure development which is not covered by our permitted development rights. **(Wessex Water)**	
The Council has provided no specific evidence to justify the need for strategic gaps in addition to the protection afforded to the countryside. The approach is inconsistent with the Framework. Objection is particularly raised to the strategic gap around Parklands Village. **(Mead Realisations Ltd)**	The justification for strategic gaps is set out in the justification for Policy LP10 and in the Strategic Gaps Background Paper November 2023. In the Strategic Gaps Background Paper October 2025, para 4.5 the Council indicates that Parklands Village is regarded as part of the town of Weston-super Mare in planning policy terms. Therefore, in the emerging Local Plan the settlement limits between Weston-super-Mare and Parklands Village have been amended with the result that Parklands Village is now proposed to lie within the settlement limits of Weston super-Mare. The area of strategic gap near West Wick that previously lay between the settlement limits of Weston-super-Mare and Parklands Village has consequentially been deleted.
It is felt there is no locus for strategic gaps in the NPPF; they are a legacy of a policy approach to protect the countryside for its own sake. If the Council proposes to continue with strategic gaps, then they should be substantially reduced. The current gaps impose significant restraints on development at the most sustainable locations, particularly Weston-super-Mare. For the sequential approach in the spatial strategy, the Elm Grove Nursery site at Locking is part of 'wider Weston-super-Mare', so land to the north and east of Elm Grove Nursery should also be categorised similarly. If the Elm Grove Nurseries site is deemed not prejudicial to the strategic gap, notwithstanding the very narrow gap retained from Oak Tree residential park, then the Moss II land cannot reasonably be held to be prejudicial to the strategic gap and its objectives. Suggestion to delete Policy LP10 and remove the Strategic Gap designations from the Policies Map. Alternatively, critically review the spatial extent of the strategic gaps, particularly at Weston-super-Mare, to remove land that can reasonably be developed to deliver housing growth at the most sustainable locations in accordance with	The justification for strategic gaps set out in the Justification for Policy LP10 and in the Strategic Gaps Background Paper November 2023 is appropriate. Strategic gaps have been tightly drawn to only affect the minimum land needed to fulfil their function. The Council has largely managed to meet the housing requirement without affecting strategic gaps. As an exception to this, the Council decided to propose an extension to an existing housing allocation at Elm Grove Locking, affecting part of the strategic gap, as explained in section 5 of the Strategic Gaps Background Paper October 2025. The Moss II land is much more conspicuous, notably from the adjoining A371, and includes rising land to the east. The Moss II land is considered in the Strategic Gaps Background Paper November 2023 , as site "C - land purple hatched, north of the A371 by Drove Farm" in para 6.13. Para 6.23 concludes that "site C should remain within the strategic gap". Schedule 1 of the Plan categorises housing allocations at places like Locking, Hutton, etc as "Wider Weston super Mare area" because of their



the settlement hierarchy / spatial strategy. **(Miller Homes)**	proximity to Weston super Mare. However, that does not mean that settlements with defined limits like Locking and Hutton should be allowed to coalesce with Weston and lose their separate identities.
Objection to designating the land West of Hillier's Lane Churchill as strategic gap. There is already a natural strategic gap in the form of Old Farm, Churchill Green. The designation will devalue the land and potentially mean it will not be maintained nor managed as effectively in the future. (**Oliver Stubbs)**	Land west of Hillier's Lane is appropriate for inclusion in the strategic gap largely because it helps reduce risk of coalescence of the settlements from ribbon development along the A38 and development of the fields west of the lane.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support for this policy and agree with the current extent of the Strategic Gaps, which should be protected. The purpose and principle of the Strategic Gap should remain even in the face of increasing residential requirements. They play an important role in maintaining the local character and distinctiveness of the settlements, and the sense that they are separate places. **(Mac Mic Strategic Land (Land north of Banwell Road))**	Comment noted.
Suggested modifications:	
Draft Policy LP10 should be amended to introduce clear and proportionate flexibility, confirming that development serving legitimate community, education or Green Infrastructure functions may be appropriate where it is compatible with the role and function of the Strategic Gap and does not harm settlement separation. **(Ainscough Strategic Land, Wain Estates, Bellway Homes Ltd, Bloor Homes South West)** If the extension of Green Belt is not approved, then the area between Nailsea and Backwell should automatically revert to the designation of 'Strategic Gap'. **(Nailsea Action Group)** Include reference to protecting area for protection of rare species, Greater and lesser Horseshoe bats, as well as maintaining landscape free of development. **(YACWAG)**	



Introduce a strategic gap (or gaps) between the urban area of Weston- super-Mare and the rural Parish of Bleadon, to reflect the full length of the boundary between the two areas.
(Bleadon Parish Council)

Exclude a permitted existing area of caravan storage at Stonebridge Farm from the Strategic Gap.
(Ainscough Strategic Land - Stonebridge Farm)

Add additional bullet point indicating an exception will be made for essential infrastructure development where this cannot be located elsewhere.
(Wessex Water)

Remove the Strategic Gap designation from the land West of Hillier's Lane.
(Oliver)

Delete Policy LP10 and remove the Strategic Gap designations from the Policies Map. Alternatively, critically review the spatial extent of the strategic gaps, particularly at Weston-super-Mare, to remove land that can reasonably be developed to deliver housing growth at the most sustainable locations in accordance with the settlement hierarchy / spatial strategy such as Moss II land near Parklands Village which does not make an essential contribution to maintaining separation from the wider urban area of Weston-super-Mare.
(Miller Homes)

Remove the entire western field at Elm Grove Locking from the strategic gap to allow a comprehensive development on the wider site. Alternatively extend the draft housing allocation boundary slightly northwards to include a slither of the developable area on the western field currently excluded from the allocation.
(Gladman Developments)

Delete Policy LP10 and remove the Strategic Gap designations from the Policies Map. Alternatively, critically review the spatial extent of the strategic gaps, particularly at Weston-super-Mare, to remove land that can reasonably be developed to deliver housing growth at the most sustainable locations in accordance with the settlement hierarchy / spatial strategy such as land South of Laney's Drove which does not make an essential contribution to maintaining separation from the wider urban area of Weston-super-Mare.
(Wall Holdings Ltd)

The Strategic Gap should be amended to exclude both the M7 site (Land adjacent B3133, Congresbury - HE20502) and the proposed Yatton secondary school site.
(M7 Planning Ltd)



Land south of Greenhill Road, Sandford should be removed from the proposed strategic gap for Sandford and Churchill.
(Waddeton Park Ltd)

Exclude land north of Greenhill Road, Sandford, from the strategic green gap. It could deliver 37 homes, without compromising the essential separation between Sandford and Churchill.
(Woodstock Homes Ltd)

A new strategic gap between Yatton and Kenn should be designated to protect land east of the B3133 near North End Yatton from development, as well as the corridor of land either side of the B3133 towards Clevedon.
(Yatton Parish Council)



LP11: Transport infrastructure, allocations and safeguarding and Schedule 7

Policy LP11: Transport infrastructure, allocations and safeguarding and Schedule 7	
Number of representations received: 35	
Number of objections based on policy being unsound: 21	
Not positively prepared: 12 Not justified: 14 Not effective: 18 Not consistent with national policy: 10	
Number of objections based on policy being not legally compliant: 9	
Number of objections based on policy being not compliant with Duty to Co-operate: 6	
Main Issues Raised:	**North Somerset Council Officer Response:**
Consider there are shortcomings in the analysis of traffic impacts as a result of development. No overall assessment of traffic growth over the 15 year plan period; no strategy for routing traffic through routes across North Somerset; does not address existing transport issues in impacted villages and rural lanes; does not address additional HGV and other commercial traffic impact. **(Tickenham Road Action Group)**	The Transport Assessment prepared for the Local Plan 2041 covers the entire NSC network. Strategic model scenarios test cumulative impacts of all proposed development within the plan.
Objection to the safeguarding of Worle Station parking on Bridge Farm site. No evidence it is needed, or has been sought, or that alternatives have been considered. **(Autograph Homes)**	This allocation is carried from the previous adopted development plan and referenced in the Joint Local Transport Plan. It is considered that the scheme will be required over the plan period given the proposed population growth within the town.
It is absolutely essential that a mass transit corridor is constructed between the city of Bristol and the Airport if the Woodspring development and the airport expansion to 15mppa (in addition to the EPIC campus - already approved) are to go ahead without causing transport mayhem, particularly on the A38. It is imperative that a route alignment is identified through the Woodspring site as a precursor to development, so that there is no ambivalence about	Mass Transit is referred to in the Local Plan 2041 and identified in the Infrastructure Delivery Plan. This acknowledges the relationship with the proposed Woodspring Strategic Site including the need to consider routing of the scheme through the Woodspring development. The Woodspring development requires it to not prejudice any future delivery of mass transit.

where it might eventually run, or worse still there is no potential for the route to be implemented once development has stymied potential options. **(Barrow Gurney PC)**	
A mass transit route should be considered from Worle to Bristol Airport. In addition, further work must be undertaken to allocate suitable park and rides to accommodate airport passengers arriving from the south and west. **(Backwell PC Nailsea TC Flax Bourton PC Brockley PC BackwellRA Nailsea Action Group)**	There are currently no plans for a mass transit route between Worle and Bristol Airport, it is served by a frequent airport flyer bus service. Any future need in this regard would likely need to be addressed through review of the Joint Local Transport Plan.
Strong objections to the proposed safeguarding of land to the east of Backwell to deliver a strategic rail crossing from the A370 to Station Road, Nailsea. A technical report prepared by JR Transport Planning demonstrates that the proposals are wholly unsound and would not provide appropriate mitigation for development proposals at Nailsea and Backwell. **(Backwell PC Nailsea TC Flax Bourton PC Brockley PC Backwell RA Nailsea Action Group)**	Options for the mitigation of development have been considered through the Transport Assessment, including Appendix E (Nailsea and Backwell Transport Mitigations Report) and this has concluded that the Cross Rail Link is the most suitable mitigation as part of a wider package of measures.
Suggest the J21 Relief Road safeguarded scheme be removed from the plan as no justification for it, or further clarity provided. **(Bellway Homes Ltd, Bloor Homes South West)**	Scheme is to be retained in the local plan as a longer-term scheme with any proposals subject to future engagement with National Highways. The scheme is assigned a lower priority at this stage in the Infrastructure Delivery Plan indicating that investment priority will be given to other transport schemes. However, it is considered necessary to retain this safeguarding.
It may now be appropriate to remove the safeguarding of the Banwell Bypass scheme route, given that this new infrastructure is committed (via a Planning Permission) and is under construction (with expected completion in early 2027). **(Bloor Homes South West Ltd)**	Once the bypass is complete, safeguarding would be removed at the next opportunity.
Query over robustness of transport evidence, highlighting: • Insufficient information on new road schemes, their justification, and how they relate to land-use proposals.	The Local Plan 2041 has been subject to extensive transport assessment at each stage of its preparation. This is documented in the Transport Assessment that explains the approach taken, including to transport



• A disconnect between the Local Plan and the Local Transport Plan (JLTP4), making it unclear how transport and growth strategies align. • Lack of clarity on Infrastructure Delivery Plan content and missing transport requirements not shown on the Policies Map. • No assessment of key issues along the A38 corridor, including airport impacts, mass transit, and poor east-west connections. • Stock Lane is narrow, congested, and unsafe for pedestrians; Policy LP23 references improvements but gives no detail. • Banwell Bypass impacts on A368/A38 corridor villages (Sandford, Churchill, Upper Langford, Burrington) are not explained. • Concern that the new Churchill Gate roundabout is justified as a bus scheme rather than addressing real traffic growth. **(Burrington Parish Council)**	modelling and the identification of transport mitigation that is required based upon the proposed package of allocations.
There should be an active travel route between Cleeve / Claverham and Backwell, in particular to enable school students to travel to and from school in Backwell. Cleeve Parish Council would like this to be written into Schedule 7 of the Plan. **(Cleeve PC)**	It is not proposed to add new routes at this stage of the plan's preparation.
The proposed Markham Brook active travel route is not justified. **(Easton-in-Gordano PC)**	The route has been identified as part of a package of transport mitigation through the Transport Assessment to support delivery of the Pill and Easton-in-Gordano strategic location. A modification is proposed to the plan in respect of this scheme responding to comments received through the consultation regarding feasibility of achieving a crossing over Markham Brook.
Policy LP11, and the proposals map, refers to a "Potential sustainable transport extension of the reserved transport corridor through the Youngwood Lane site to Station Road, Nailsea." Schedule 7 reconfirms the 'reserved transport corridor within consented Youngwood Lane development, Nailsea' and 'Station	A modification is proposed to clarify the requirements for a new sustainable transport corridor connecting through the Youngwood Lane site, through the proposed Land South of Nailsea allocation, and onwards to Station Road, Nailsea.



Road to A370, Cross Rail Link, Nailsea and Backwell' as 'major transport schemes.' The Infrastructure Delivery Plan schedule further confirms that this infrastructure is considered to be 'essential', and to serve and enable development to the south of Nailsea and at Backwell. The plan clearly anticipates a new road to the south of Nailsea, to create sustainable transport links and serve the allocations across the southern edge of Nailsea. However, there is a missing section, from Station road to the Youngwood Lane allocation i.e. across the south Nailsea allocation. The associated policy (LP3) asks for access via The Perrings to be investigated, but that access is not deliverable and even if it were the route via The Perrings and other residential roads is unsuitable for a strategic road link. **(Gleeson Land)**	
Due to the proximity of the proposed new Cross Rail Link Road to Moorside Farmhouse Road and Wooleys Farmhouse, both Grade II Listed buildings, great care should be taken to limit the impact by a restrained and landscape led design response. **(Historic England)**	North Somerset Council agrees that heritage impact will be an important consideration in the detailed design of this road. A Statement of Common Ground has been prepared with Historic England.
Welcome the sustainable travel objectives of this policy, however, we are concerned about the alignment shown on the Policies Map for the strategic cycle link between Clevedon and Portishead. The proposed route would utilise the single narrow access to Clevedon School (via Valley Road) and pass through the school's playing fields along the southern boundary, crossing Holly Lane. Clevedon School is currently within the DfE's school rebuilding programme. The DfE's design concept for the new school does not currently include provision for a cycle route across the site. We request that the draft Policies Map be amended to show the cycle route following an alignment that runs outside the school boundary. **(Department for Education)**	This route is already safeguarded so is not a new route in the emerging local plan. Whilst there are some proposed amendments to the route further on, the section near the entrance to Clevedon school has not been changed from the already safeguarded route. It is open to the DfE to propose an alternative through their planning application and this would then be considered.
Growth proposed at Pill and Portishead does not provide any improvements towards transport infrastructure in Pill and Easton-In-Gordano. The transport hubs mentioned in the schedule are already	The Transport Assessment addresses this and has considered impacts from proposed development in the Portishead and Pill areas. Appropriate mitigations are proposed, including the transport hubs referred to, active



being delivered as part of other programmes. Junction 19 and the A369 are at capacity. The current rail service has a capacity of one passenger train per hour. **(Justin Saunders, Lucy Byrne)**	and sustainable travel measures and capacity improvements at M5 Junction 19.
The Local Plan provides insufficient transport and commuting infrastructure to support the scale of growth proposed for Nailsea and Backwell. Key points raised include: • Existing congestion will worsen, as most new residents will continue to commute east toward Bristol using roads that are already over capacity. • The transport proposals listed in the Local Plan do not relieve wider congestion, as many schemes (e.g., the Youngwood Lane corridor and Cross Rail Link) are confined within the strategic location boundary and do not address the external road network. • Rail capacity is a severe constraint: trains to Bristol are already full at peak times, and the plan contains no measures to increase passenger capacity. Station improvements (platform extension, transport hub) are either uncertainly funded or unlikely to improve capacity. • Other listed infrastructure, such as the Nailsea–Clevedon strategic cycle link, does not address commuting pressures to Bristol, the main destination for local workers. **(Nailsea Action Group)**	The Nailsea and Backwell Transport Strategy (Appendix E to the Transport Assessment) sets out the approach to transport mitigation for Nailsea and Backwell including the consideration of infrastructure alternatives not taken forward, explaining why they have been discounted.
We welcome the inclusion of buffer areas around M5 J19, J20 and J21. We suggest that the buffer shown on the Policies Map for M5 J20 should extend further west to include the full extent of Ettlingen Way to protect land for the LP11 Ettlingen Way Capacity Improvement (which is not listed in Schedule 7). Observation that no reference is made to capacity improvements at M5 J19, the M5 J21 bypass included in Schedule 7, or any safeguarding of land for a new junction south of M5 J21, implying these schemes are not proposed for delivery during the plan period. National Highways	Proposed modifications are made to the Local Plan 2041 to address this in addition to identification of more detail on the schemes in the IDP. The buffer zones are proposed to be extended as requested. The Council have prepared a Statement of Common Ground with National Highways to address this.



would welcome further confirmation of proposals for each location and their status within the plan. **(National Highways)**	
Welcome the safeguarded 10 m corridor along rail routes. Query over the continued safeguarding of the 'Southern Rail Chord', which appears to hark back to a historic idea for a new alignment and does not feature in current strategic plans for the local network. **(Network Rail)**	Support noted. Whilst not currently designed nor a funded proposal, the council's position is that it is prudent to continue to retain the safeguarded alignment.
Concerns about the escalating traffic problems on the B3130 through Tickenham, arguing that the situation has become unacceptable for residents. Key points include references to severe traffic congestion, heavy HGV traffic, large vehicles, lack of alternative routes to the M5 and pedestrian safety. **(Wendy Beer)**	Strategic model scenarios tested cumulative impacts of all proposed Local Plan 2041 development and this work is considered robust. Mitigations have been identified in line with the principles of Vision Led approach and NPPF. No severe impacts have been identified on B3130 through Tickenham.
Major Transport Schemes	**North Somerset Council Officer Response:**
Observations on the flood zone that various major transport scheme allocations fall within and request for engagement in future regarding access arrangements for maintenance. **(Environment Agency)**	Noted**.**
Strong objection to the proposed Cross Rail Link (CRL), raising extensive concerns about feasibility, environmental harm, community impact, and safety. It is felt that there will be a severe impact on residents, in respect of pollution (air, noise, light) and visual intrusion amplified by valley topography. Note that the route passes through Flood Zone 3, high-sensitivity landscape, Green Belt and prime agricultural land. Objection to the large proposed bridge (12.5m high, 250m ramps), calling it visually dominant and harmful. There is a lack of costing or funding, and the prospect is uncertain. Recommend a North Nailsea Link Road instead if the East Backwell allocation is removed. **(Diane Snape, D A Gray, Cllr B Petty, David Sheridan)**	The suitability of the scheme is underpinned through the Transport Assessment (notably Appendix E) that supports the Local Plan 2041. This has taken into account the proposed allocations and the need to identify a package of mitigation to support this. The scheme is now proposed to be constructed under the railway, rather than over as was previously proposed, and whilst this raises different design challenges, these are considered feasible. Impacts of the scheme on the landscape and local area will be considered in greater detail as the scheme design is progressed and this will include any appropriate mitigations such as landscaping, material selection etc. The scheme is assessed as having a range of strategic benefits as part of a package of transport mitigation for the Nailsea and Backwell area. An alternative, northern link road option has been considered but is not considered preferable, nor would it have the same strategic benefit as the preferred solution.



Motorway Junction Buffers	
There is no explanation in the plan as to what a motorway junction buffer is. **(D A Gray)**	Additional text is proposed in Schedule 7 to provide details of motorway junction proposals within the safeguarded Motorway Junction Buffers. Essentially, they are intended to safeguard highway land to ensure future works to the junctions are deliverable.
Railway safeguarding and future potential widening	**North Somerset Council Officer Response:**
The provision of a 10 metre rail safeguarding policy throughout the main line railway corridor is not supported through the evidence base. There is no reference to the need for it at all in the Transport Assessment. It is not justified, will cause planning blight and could not realistically be delivered and does not appear to have the support of the rail transport authority, Network Rail. **(DPC Contractors)**	This is a justified approach. Network Rail confirm in their representations that they welcome the 10m safeguarded corridor.
Extension and reopening of railway station platforms	**North Somerset Council Officer Response:**
Clarification sought on whether there is a specific driver behind each of the platform extensions. **(Network Rail)**	Policy seeks to facilitate improvements as required with flexibility built in. The need for and scope of any improvements would be via engagement with Network Rail and other stakeholders.
Transport hubs at railway stations	**North Somerset Council Officer Response:**
Support for the development of integrated transport hubs at railway stations, which will enhance connectivity and improve the overall passenger experience. **(Network Rail)**	Support noted.
Object to the proposed expansion of Nailsea and Backwell railway station on Station Road. It is not suitable for development as a future transport hub. There is insufficient space for increased parking and bus interchange facilities. The current station is very small and basic and there is very limited scope to improve the facilities in its current location. It is inaccessible for people with mobility challenges and is difficult to navigate when travelling with young children. It is difficult to see how the station could be expanded without filling the strategic gap and impacting upon wildlife and ecology. **(Diane Snape, Charlie Crooks)**	A proposed change to the plan countenances the possibility of relocation (rather than improvements to the existing station) if this is feasible.



Active Travel routes	**North Somerset Council Officer Response:**
There is reference in the plan to a 'Strawberry Line Extension – Congresbury to Blagdon'. While this might have been raised as a preferred route many years ago, it is very unlikely that anything significant could be done about it now. **(David Glynn)**	This scheme is still identified as considered beneficial. However, it is not identified as a priority within the support Infrastructure Delivery Plan.
There is insufficient detail about the Easton-in-Gordano: Marsh Lane to A369 Motorway Service Area active travel route. It is currently a very poorly maintained footpath. **(Lucy Byrne)**	Upgrades will be required as part of proposed development with appropriate planning obligations secured to fund these works to make the route safe and attractive.
Pill to Bristol Link along River Avon: No evidence of collaboration with Bristol City Council about the necessary improvements to the Pill to Bristol active travel route along the River Avon. This path is unsurfaced and often impassible in the winter months due to mud and flooding. There are safety issues around steep unfenced edges and lack of lighting at night. **(Lucy Byrne)**	Proposed link improvements are identified within the North Somerset area but engagement with BCC would take place at scheme implementation stage.

Suggested modifications:

Reference to safeguarding Worle Station parking expansion should be omitted from Schedule 7.
(Autograph Homes)

Due to the absence of evidence to justify the J21 Bypass Scheme and information demonstrating its deliverability, we suggest it be removed from Schedule 7 and the Policies Map at this time. If considered, this will need careful evidence to justify inclusion or policy requirements.
(Bellway Homes Ltd)

More details about transport schemes, their impacts on existing settlements and routes and their relationships to proposed developments.
(Burrington Parish Council)

The proposed Markham Brook active travel route should be removed from the plan, or redraw to avoid Ancient Woodland and Priority Habitat.
(Easton-in-Gordano PC)

Add the safeguarded road link across the South Nailsea allocation. The HRA of the NSLP should include an assessment of the Major Transport

Schemes set out in LP11 (and Schedule 7), including Station Road to A370, Cross Rail Link, Nailsea and Backwell.
(Gleeson Land)

Any developments and increased use by the port needs a development plan for the A369, Junction 19 of the M5, bus service improvements and rail capacity.
(Justin Saunders, Lucy Byrne)



LP12: Bristol Airport

Policy LP12 Bristol Airport	
Number of representations received: 36	
Number of objections based on policy being unsound: 21	
Not positively prepared: 11 Not justified: 16 Not effective: 15 Not consistent with national policy: 7	
Number of objections based on policy being not legally compliant: 5	
Number of objections based on policy being not compliant with Duty to Co-operate: 4	
Main Issues Raised:	**North Somerset Council Officer Response:**
The policy approach is too restrictive and does not positively consider the future needs and requirements of Bristol Airport as set out in their adopted masterplan. **(Bristol Airport)**	Disagree. The policy approach is justified by the evidence base, aligning to the consented growth to 12 million passengers per annum. The airport's masterplan for further growth is recognised, but does not have any formal planning status.
Future growth at the Airport has not been considered within the Transport Assessment prepared as part of the Evidence Base, and the policy requirement for the Airport to deliver a transport improvements is too onerous. **(Bristol Airport)**	The transport modelling includes the consented growth as a commitment. The airport will be expected to undertake their own modelling as part of their transport assessment work that accompanies any planning application. The policy wording that requires the airport to define and deliver transport improvements is entirely reasonable, it is not necessary for the policy to identify supporting partners such as the West of England Combined Authority.
As drafted the requirement for Bristol Airport to define and deliver a low carbon, accessible, integrated, and reliable transport network, for both staff and passengers to access he airport when they need to places an unrealistic burden solely on Bristol Airport. **(Bristol Airport)**	We accept that as drafted the wording goes over and above the requirement that this stems from in the Joint Local Transport Plan (JLTP4) which states: *"We [WECA] will work with Bristol Airport to define and deliver a low carbon, accessible, integrated, and reliable transport network, for both staff and passengers…".* We therefore propose a minor wording change to make clear this is not solely the responsibility of the Airport.



Traffic related to the airport has an adverse effect on local communities, particularly around rural lanes. Any increase in passenger numbers will bring increasing pressures. Mass transit proposals must be secured before any further expansion. (**Backwell PC, Nailsea TC, Flax Bourton PC, Brockley PC, Backwell Residents Association and Nailsea Action Group/Wrington Parish Council/Barrow Gurney Parish Council/Nempnett Thrubwell Parish Council/Cleeve, Parish Councils Airport Association, Chris Lowe)**	The transport assessment modelling that supports the Local Plan includes the consented airport growth up to 12 million passengers. Any further planning applications for growth at Bristol Airport will be required to take account of the proposed Local Plan growth in a transport assessment. The policy as drafted requires appropriate surface access improvements and major public transport infrastructure and services, as well as support to deliver a mass transit link.
The council should ensure that Bristol Airport comply with their current planning conditions and put more resources into supporting villages impacted by the airport's operation. (**Backwell PC, Nailsea TC, Flax Bourton PC, Brockley PC, Backwell Residents Association and Nailsea Action Group)**	Whilst we understand the concerns this is not a matter for the Local Plan.
Light pollution should be explicitly listed in the policy. (**Backwell PC, Nailsea TC, Flax Bourton PC, Brockley PC, Backwell Residents Association and Nailsea Action Group)**	The second bullet point lists some of the issues that can affect local residents, and uses the word 'including', it is therefore not an exhaustive list, and the policy is clear that all environmental impacts will need to be considered.
Removal of Green Belt protections risks urban sprawl and protection of the countryside. **(Cllr Thomas Daw, S Ashworth, E Arnold, Mr D Wheeler)**	As set out in the policy and the Green Belt Background Paper that forms part of the evidence base, it is considered appropriate for the Green Belt extent to align with the now consented operational area of the airport. Beyond the Green Belt inset shown on the policies map Green Belt policy applies.
General opposition to further airport expansion and the impacts this can have on local communities, the highway network and the environment. Comments that expansion of the airport will inevitably increase carbon emissions and conflict with the Local Plan's wider objectives on climate change, as well as specific impacts upon local residents such as noise, night flights, light pollution, air quality and inconsiderate parking. **(Cllr Thomas Daw, S Ashworth, Guy Stone, Ruth Revell, E Arnold, C Wheeler, Jessica Adams, Cllr Bridget Petty, Colin Knowles, Mr D Wheeler, John Polden, Chris Segar, Paul Segar,**	This policy reflects the now consented operational area and permits further sustainable development within the Green Belt inset. Any further growth will need to be justified and the policy explicitly states 'climate impacts of the development must be weighed in the planning balance taking account of national climate change policy and carbon reduction targets'. Any future growth will be subject to, and assessed through, a planning application, where environmental, economic and social impacts will need to be addressed.



Julie Main, Nicky Connell, Nempnett Thrubwell Parish Council, Philip Heath, Butcombe Parish Council, Andy Connell, R Stevenson, Molly Foskett, Cleeve Parish Council, Parish Councils Airport Association, Sally Bartlett, Shail Patel)	
Support/Other Comments:	**North Somerset Council Officer Response:**
Support for a mass transit link for the airport and recommend this should be implemented when passenger numbers exceed 12 million annually. (**Backwell PC, Nailsea TC, Flax Bourton PC, Brockley PC, Backwell Residents Association and Nailsea Action Group)**	Support noted.
Support for the need for all airport development to be accompanied by clear surface access proposals that will increase the use of public transport and minimise congestion and other local impacts. **(National Highways)**	Support welcomed.
Support for the policy approach reflecting the consented level of growth, noting that any further expansion will be subject to policies in the Local Plan. **(Bath and North East Somerset Council)**	Support noted.
Recognition that growth at Bristol Airport has cross boundary impacts upon the wider highway network and any proposals for mass transit schemes or wider sustainable transport interventions will need to be integrated with any West of England proposals. **(Bath and North East Somerset Council).**	This is noted, and North Somerset will work closely with B&NES, and other neighbouring authorities, to manage any cross-boundary impacts. This matter is addressed in a Statement of Common Ground.
Observation that the key diagram gives the incorrect policy reference for LP12. **(Bristol Airport)**	Noted. This will be addressed through a change to the plan.
Suggested modifications:	
The paragraph on the impacts of airport operations and of any new airport development on the living conditions of residents should include the word REDUCE as well as mitigation. Recommendation that the term ‘reduce’, regarding nighttime flights, be included in Policy LP12 itself.	



Suggestion that criterion 3 should explicitly require development proposals to include measures to actively discourage and prohibit the use of the rural lanes and direct vehicles to use the A38 corridor.

Request for criteria 2 to include reference to the impact of lighting and light pollution.
(**Backwell PC, Nailsea TC, Flax Bourton PC, Brockley PC, Backwell Residents Association and Nailsea Action Group)**

The paragraph on the impacts of airport operations and any new airport development on the living conditions of residents should include the word 'REDUCE' as well as mitigation. The PCAA note that use the word reduce in relation to nighttime flights in the justification of Policy LP12, but the word needs to be in the actual policy.
(Parish Councils Airport Association)

We expect NSC to include a cumulative assessment of emissions is necessary of airport expansion plans within the policy LP12.
(Parish Councils Airport Association)

Request from Bristol Airport to extend the Green Belt inset to align with their adopted masterplan.
(Bristol Airport)

Key Diagram on Page 15 of the plan refers to Bristol Airport as Policy LP9. This should be corrected to LP12.
(Bristol Airport)

Request for wording amendment to reflect the fact that Bristol Airport are not solely responsible for delivering an enhanced transport network.
(Bristol Airport)



LP13: Air safety

Policy LP13 Air Safety	
Number of representations received: 7	
Number of objections based on policy being unsound: 3	
Not positively prepared:0 Not justified: 0 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
The extent of Public Safety Zones is subject to change and this should be explicit within the policy. **(Bristol Airport, and Backwell PC, Nailsea TC, Flax Bourton PC, Brockley PC, Backwell Residents Association and Nailsea Action Group)**	This policy applies to the Public Safety Zones (PSZ) that are in place at any time, and the current iteration is denoted on the policies map. If any changes are subsequently made to the PSZ following adoption of the Local Plan, the policy should apply to the new extents. Suggested change to policy justification wording to clarify this.
In respect of the helicopter safeguarded corridor, use of the words 'within, and in the vicinity of….' are too imprecise. **(Bellway Homes)**	This is considered appropriate to allow judgement to be made on a case-by-case basis rather than being too prescriptive or unnecessarily widening the corridor.
Felton Common is a public open space that is within a defined Air Safety Zone. The PCAA question whether the Common and the replacement land will become higher risk due to the extended runway and lighting and need to be re–categorised as such. **(Parish Councils Airport Association, Winford Parish Council)**	As explained in the policy justification, the extents defined are outside of the control of the council, and any changes to them are considered and made through other regimes. The policy wording will apply to any updated extents in future.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support this policy out of necessity for safety reasons. **(Wrington Parish Council)**	Support noted.



Suggested modifications:
Suggest minor addition to the Policy wording to futureproof the PSZs - 'Specifically, within the Public Safety Zones (1-in-100,000 individual risk contours) at Bristol Airport, shown on the Policies Map (or any replacement thereof)' **(Bristol Airport)** Request for further clarity on policy wording that states 'in the vicinity of'. **(Bellway Homes Ltd)**



LP14: Royal Portbury Dock

Policy LP14: Royal Portbury Dock	
Number of representations received: 5	
Number of objections based on policy being unsound: 3	
Not positively prepared: 3 Not justified: 3 Not effective: 3 Not consistent with national policy: 3	
Number of objections based on policy being not legally compliant: 3	
Number of objections based on policy being not compliant with Duty to Co-operate 3	
Main Issues Raised:	**North Somerset Council Officer Response:**
Request for land within Shipway Farm area be removed from the Green Belt to facilitate further port related development, as currently the growth of Royal Portbury Dock is constrained by this policy. **(The Bristol Port Company)**	This policy recognises the strategic importance of Royal Portbury Dock and provides support for the development of facilities and infrastructure within the port estate subject to a number of criteria. As set out in the representation from Bristol Port Company, no evidence of a full analysis of options for accommodating the need for additional transit storage facilities – either within the existing port site, on land not in the Green Belt, nor land adjacent to the port within the Green Belt has been provided to the council as this work has not been completed. We would expect to see a masterplan for future development of the port, setting out alternative options for the provision of transit storage facilities and why they have been dismissed. As set out in our response to comments under Policy SP7 and LP9, no exceptional circumstances have been demonstrated to justify this requested change.



Support/Other Comments:	**North Somerset Council Officer Response:**
Observation from Environment Agency that flood risk and water compatible uses are relevant considerations. **(Environment Agency)**	Noted.
Welcome recognition that any further development will likely require improvements at M5 Junction 19 and support the policy requirements. **(National Highways)**	Noted.
Suggested modifications:	
Request to amend Policy LP14: Portbury dock with the addition of "The remaining Green Belt land located between the port estate and Pill and Easton-in-Gordano is considered extremely sensitive in preventing coalescence and checking unrestricted urban sprawl. **(Pill & Easton-in-Gordano Parish Council)** BPC requests that Policy LP14 be revised to make appropriate, positive provision for the long-term development needs of RPD by including the following statement: *"Land within Shipway Farm will be removed from the Green Belt and safeguarded for development for port uses. Where need is demonstrated, development will be permitted subject to satisfactory environmental safeguards."* Linked to the above, BPC considers that the Local Plan vision and strategic priorities should include express reference to the strategic role of RPD as a transport infrastructure asset and employment location and, in this context, to the need to meet its development needs over the plan period to secure economic benefits for North Somerset and the wider South West region, deliver green jobs and facilitate the transition to net zero. Related to this, it is BPC's view that RPD should be expressly identified as a strategic employment location on the Policies Map, within LP14 and also within Policy SP3 (Spatial Strategy) and Policy SP9 (Employment). BPC considers that the following additional changes to Policy LP14 should be made (additional proposed wording is underlined and text which should be removed is struck through): *"Within the Royal Portbury Dock policy area as defined on the Policies Map, the development of facilities and infrastructure which contribute to ~~sustainable improvements to operational efficiency and~~ its role as a strategic employment location, transport infrastructure asset and international gateway will be supported provided that:* *• ~~The proposed development is for a port related use;~~* *• The impacts of the operation of the port and any new development on the living conditions of residents and the environment, including noise, air*	

quality, visual and landscape impact, biodiversity and climate change, are not unacceptable;
• Improvements are made to the highway network serving the port including M5 J19 access, junction capacity, highway safety, public transport access, footways and cycleways as necessary to make the development acceptable in planning terms;
• Benefits to the local economy and community are maximised where possible;
• Opportunities for renewable energy generation and low/zero emission fuels (such as green hydrogen) are considered and maximised as appropriate ~~including the production of green hydrogen~~; and
• National and locally important species and habitats are retained and enhanced where possible."

The supporting text to Policy LP14 should be amended to read "The remaining gap is also considered to be highly sensitive in terms of ecology. Within the Port estate there is ~~The area includes~~ a network of wildlife corridors…".
(The Bristol Port Company)



LP15: Local Green Space and Schedule 3

Policy LP15 Local Green Space and Schedule 3	
Number of representations received: 13	
Number of objections based on policy being unsound: 10	
Not positively prepared: 7 Not justified: 6 Not effective: 10 Not consistent with national policy: 5	
Number of objections based on policy being not legally compliant: 2	
Number of objections based on policy being not compliant with Duty to Co-operate: 3	
Main Issues Raised:	**North Somerset Council Officer Response:**
The policy for LGS is supported but, regarding Local Green Space in Wrington: • The "Old Quarry off Wrington Hill" was renamed in 2023 by Wrington Parish Council as "Prestow Wood Nature Reserve". This should be corrected on the schedule, and its boundary corrected to also cover the triangular area indicated. • The Recreation Ground in Wrington should be included as a piece of LGS. **(Tony Harden)**	The "Old Quarry off Wrington Hill" LGS site, as drawn, is long standing and has been carried over from the adopted Site Allocations Plan. Since then there have been public consultations on various versions of the Plan and at no point do we appear to have had representations from Wrington Parish Council requesting a change in name or area for the site. In these circumstances the existing name and area are considered appropriate; the name is helpful as it points to the location and previous use of the site.
Recreation space and tennis courts in Wrington (in Silver Street/Cox's Green) is not in Schedule 3. This is a major community facility for sports events, as well as a children's play area. **(Paul Segar)**	With regard to the Recreation Ground at Wrington, near Silver Street and Cox's Green, para 2.8 of the Council's Background Paper on Local Green Space states: **"***It is not considered that formal playing fields with marked sports pitches will normally be appropriate for LGS designation. They are already covered by other protective policies, such as policy DP52. Also they are often associated with sports clubs, schools or colleges, with restricted access to the general public".* The children's play area alone is under 0.2 ha. Para 2.18 of the Council's

	Background Paper on Local Green Space states: "*As they are green spaces of particular local significance Local Green Spaces should be at least 0.2 hectares in size* ".
It would be beneficial if some sites were designated as 'Local Green Space' or 'Village Green' to provide more protection from investors who buy up green space and apply for building planning application. Nailsea Action Group are particularly concerned that the areas below are as well protected as possible: • The Perrings open space • Netcott's Meadow, • The space north of Blakeney Close • All of Trendlewood Park including the land south of Bibery Close. Request to increase and ease the ability for identifying and securing LGS. **(Nailsea Action Group)**	Areas identified as LGS in the Plan, including those referred to, will be protected under Policy LP15 when it is adopted, which offers a strong degree of protection. The Council must have regard to national guidance, and our interpretation of that as set out in the Background Paper on Local Green Space, in determining which green spaces should be designated as LGS.
Morgans Hill LGS seems incorrectly drawn. Land south of Nailsea football ground is designated both as the local green space and part of the Youngwood Lane development site. This land should be entirely in Morgans Hill local green space and not built on. **(Nailsea Action Group, Reis Braganza)**	The LGS at Morgans Hill is correctly drawn. A small part of it overlaps with part of the housing allocation, Land south of Nailsea. It is proposed to amend the housing allocation so it no longer overlaps with the Local Green Space at Morgans Hill for clarity.
The currently proposed areas of Local Green Space in Nailsea are grossly inadequate. The Plan should provide for creating far more within Nailsea, including but not limited to the green space off Trendlewood Road, opposite Avening Close. **(Graham Scott)**	The Council must have regard to national guidance, and our interpretation of that as set out in the Background Paper on Local Green Space, in determining which green spaces should be designated as LGS. There are two green areas off Trendlewood Road, opposite Avening Close, one being a small triangular area directly south of the Avening Close/Trendlewood Way junction, and the other being an area of trees opposite 1-5 Trendlewood Way. Both areas are under 0.2 ha. Para 2.18 of the Council's Background Paper on Local Green Space states: "*As they are green spaces of particular local significance Local Green Spaces should be at least 0.2 hectares in size."*
The Policy lacks clarity and should be modified to make it effective with additional text: *"Any development permitted must have very*	The suggested text is appropriately included in the justification, and together with the rest of that justification, helps the reader interpret the



strong justification, be ancillary to and directly related to the particular LGS, would enhance its role and function; be very small scale relative to the open area, and sensitively sited and designed". **(Persimmon Homes)**	policy. The policy and justification together mean there is adequate clarity.
The allotments on Woodhill should be included as a Local Green Space, to be preserved for local people for continued ability to be connected with nature and food production. **(Mrs M T Kingston)**	Para 2.10 of the Council's LGS Background Paper 2025 (see Pre-submission plan 2041 evidence base at Local Plan 2041 | North Somerset Council) states "allotments will not normally be appropriate for LGS designation". Allotments are already covered and safeguarded by Policy DP51 on protection of community facilities.
Concern over the loss of "Penny Fields" in Clevedon as it is a green space used by residents and a habitat for wildlife such as a great crested newt which is a protected species. **(S Powell, Josh Litser-Mitchell)**	The land at Clevedon known as Penny Fields is allocated in the Local Plan for residential development as "land north of Churchill Avenue", having been carried over from the adopted Site Allocations Plan. Para 3.8 of the Council's LGS Background Paper 2025 (see Pre-submission plan 2041 evidence base at Local Plan 2041 | North Somerset Council states "Land with planning permission for development will not normally be appropriate for LGS designation. That is consistent with paragraph 008 of the PPG's section on LGS. Similarly, the same will apply to land allocated or proposed for development in adopted or emerging local plans or made NDPs. Again, that is consistent with the PPG (paragraph 007)." If protected species like newts are present it is likely that relevant policies on nature conservation would be considered in determining planning applications.
The proposed development of 1,817 new homes in Nailsea would lead to a total over development of the town. Greenfield Crescent playing field is not protected under Local Green Space Policy LP15. **(J Jennings)**	With regard to Greenfield Crescent playing field, para 2.8 of the Council's Background Paper on Local Green Space states: **"***It is not considered that formal playing fields with marked sports pitches will normally be appropriate for LGS designation. They are already covered by other protective policies, such as policy DP52. Also they are often associated with sports clubs, schools or colleges, with restricted access to the general public".*
Policy LP15 is generally accepted, however, the wording is very restrictive or tightly defined. Schedule 3 identifies 3 local green spaces for Locking Parklands including South of Cruikshank Grove and McCrae Road, Parklands Village, South of Post Office Road	The planning applications 13/P/0997/OT2, 09/P/1614/F, 18/P/3175/FUL and 12/P/0760/F do not largely affect the proposed LGS areas referred to, except for elements of 13/P/0997/OT2. It is therefore proposed to make minor boundary changes to the Local Green Space: SE of Bowen Rd, S of

Parklands Village and SE corner of Parklands Village (SE of Bowen Rd, S of Mannock Gardens and S of Farnborough Rd). This policy, however, does not recognise permissions that are in place at Locking Parklands (refs 13/P/0997/ OT2, 09/P/1614/F and 12/P/0760/F, 18/P/3175/FUL and RMs) Development could be compatible with the reasons for designation such as NEAPs, LEAPs, earth bunds etc. Schedule 3 should be modified to include a column for site specific requirements or to amend the justification details to "include development in accordance with the established planning permissions". **(Homes England)**	Mannock Gardens and S of Farnborough Road, Parklands Village on the Policies Map to reflect the planning permission. Existing planning approvals are likely to be considered in determining any subsequent planning applications which affect LGS areas.
Support the identification of Local Green Space in Nailsea and Backwell. Request for the Land adjacent to West Leigh Infants School to be renamed Land adjacent to Longthorn. Backwell Playing Fields should be identified as Local Green Space. Objection to the omission of land between Church Town and Hillside Road from Policy LP15 as it represents an important, well used recreational route and public right of way, and an important rural backdrop to the southwestern part of the village. Land identified under the Grove Farm housing allocation (adjacent to West Leigh School) should be removed from the housing allocation and designated as Local Green Space. **(Backwell PC, Nailsea TC, Flax Bourton PC, Brockley PC, Backwell RA, Nailsea Action Group)**	It is considered that the existing name is accurate and appropriate. Longthorn is one of three culs de sac near the LGS and the other two are nearer but not suggested for mention. With regard to the Backwell Playing Fields, para 2.8 of the Council's Background Paper on Local Green Space states: **"***It is not considered that formal playing fields with marked sports pitches will normally be appropriate for LGS designation. They are already covered by other protective policies, such as policy DP52. Also they are often associated with sports clubs, schools or colleges, with restricted access to the general public".* With regard to the land referred to between Church Town and Hillside Road, Backwell, and land adjacent to West Leigh School, it appears that both are mainly agricultural. Para 3.4 of the Council's Background Paper on Local Green Space states: *"LGS would not normally include agricultural land or orchards. Only exceptionally would this be included, in particular special circumstances where there is particularly strong justification, it clearly meets the criteria, and there is strong evidence that it holds a particular local significance and that the local community considers it to be demonstrably special, which must be satisfactorily explained. Established community orchards regularly used for community events like wassailing, might be an example. General countryside which does not meet this exception will not be appropriate for designation."*



The wording of LP15 creates uncertainty on how it is to be implemented. As worded, it is not specific to land which forms a LGS designated area and could be interpreted as applying to any land which is not part of an LGS. The supporting text states that the Council will have regard to underpinning characteristics, such as beauty and historic importance, but also whether any proposals "detract from the LGS by harming its openness or undeveloped nature". This creates an unjustified policy burden on land outside, but in close proximity to, a LGS . **(Wain Homes (Severn Valley) Limited)**	Local Green Spaces is designated on the Policies Map and it is very clear that this policy applies to those designations only. The justification adequately helps with interpretation. It is difficult to see how proposals on land outside or adjoining an LGS could affect the openness or undeveloped nature of the LGS itself.
The Public Open Space identified through planning permission 19/P/0835/OUT (development of the former quarry site) should be included in schedule 3. It will be the only significant parcel of public open space land within the entire parish. **(Bleadon Parish Council)**	The former quarry site is still being developed for housing. Possible areas for consideration for LGS can only be assessed once implemented. Therefore, this suggestion for LGS would need to be considered in preparing the next Local Plan, once the development is complete.
For Backwell only 3 areas of local green space have been identified. There are other areas which are widely used for recreation without protection and are not registered. North Somerset Council have failed to consult the community on local green spaces or to consider if more sites should be allocated. **(Ruth Revell)**	Public consultation at the various stages of Plan preparation of have provided the opportunities for respondents, particularly town and parish councils, to suggest areas for consideration for LGS. Various respondents have done so. See Table 1 of the Local Green Space background paper - November 2023
Land at village hall, Long Ashton is already green space – it is not new. **(Mr D Wheeler)**	Schedule 3 includes LGS sites which are already in adopted or made Plans. There are not necessarily new designations but existing designation which are rolled forward into the new Local Plan to continue to afford protection to these important spaces.
Netcott's Meadow (north of Backwell Lake, west of Bucklands End, Nailsea was an Avon Wildlife Trust reserve has been left to decline & is totally inaccessible. **(T Southwood)**	The Netcott's Meadow site still appears to be a local wildlife site from our records and is visible from adjoining footpaths.
Land to the south of Church Lane, Backwell is a green space well used by local walkers and residents for recreation. Any development of this site for playing fields could risk public access. **(R Revell)**	Land south of Church Lane is identified for primary school playing fields in Schedule 4 of the Plan, relating to Policy LP6 Educational, sporting, leisure and community use allocations. The land is currently agricultural land. Para 3.4 of the Council's



	Background Paper on Local Green Space states: *"LGS would not normally include agricultural land or orchards. Only exceptionally would this be included, in particular special circumstances where there is particularly strong justification, it clearly meets the criteria, and there is strong evidence that it holds a particular local significance and that the local community considers it to be demonstrably special, which must be satisfactorily explained. Established community orchards regularly used for community events like wassailing, might be an example. General countryside which does not meet this exception will not be appropriate for designation."*
Support/Other Comments:	**North Somerset Council Officer Response:**
Support for the Local Green Space policy, which is considered to be important with such significant housing numbers on the landscape. A thriving and healthy community can only exist if they have green spaces and nature within accessible reach. **(Cllr B Petty)**	Support welcomed.
Support inclusion of Farleigh Fields, Backwell. **(K Riches, Henry Andrew Bullock)**	Noted.
Support inclusion of Backwell Lake **(K Riches)**	Noted.
Suggested modifications:	
Modify Schedule 3 to include a column for site specific requirements or to amend the justification details to "include development in accordance with the established planning permissions". **(Homes England)** The "Old Quarry off Wrington Hill" was renamed in 2023 by Wrington Parish Council as "Prestow Wood Nature Reserve". This should be corrected on Schedule 3, and the boundary corrected to also cover the triangular area indicated. The Recreation Ground in Wrington should surely be included as a piece of LGS. **(Tony Harden)** Land off Trendlewood Road, opposite Avening Close, Nailsea should be LGS.	



(Graham Scott)

Backwell Playing Fields, land between Church Town and Hillside Road and land adjacent to West Leigh School should be identified as Local Green Space, and shown on the Policies Map.
(Backwell PC Nailsea TC Flax Bourton PC Brockley PC Backwell RA Nailsea Action Group)

The policy wording should be clear that this applies to proposals within land designated as a Local Green Space.
(Wain Homes (Severn Valley) Limited)

Include the area of Public Open Space identified through planning permission 19/P/0835/OUT, former Bleadon Quarry site.
(Bleadon Parish Council)

Take land to the south of Church Lane, Backwell out of the plan as proposed school playing fields, and consult on it being registered as a local green space.
(R Revell)

The Policy should be modified to make it effective with additional text: “Any development permitted must have very strong justification, be ancillary to and directly related to the particular LGS, would enhance its role and function; be very small scale relative to the open area, and sensitively sited and designed”.
(Persimmon Homes)

The allotments on Woodhill should be included as a Local Green Space.
(Mrs M T Kingston)

Land south of the Nailsea football ground is designated both as local green space and part of the Youngwood Lane development site. This land should be entirely in Morgans Hill local green space and not built on.
(Reis Braganza)

LP16: Preferred Area for mineral working – land at Hyatts Wood Farm, south of Stancombe Quarry

Policy LP16 Preferred Area for mineral working – land at Hyatts Wood Farm, south of Stancombe Quarry	
Number of representations received: 3	
Number of objections based on policy being unsound: 1	
Not positively prepared: 1 Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Objection to the expansion of Stancombe Quarry due to concern regarding level of HGV traffic particularly at night, the impact on Hyatts Wood, water run off from the quarry which blocks drains in Backwell and Flax Bourton. **(Shortland)**	The justification for the allocation is as set out in the justification to the policy. Planning applications will need to meet relevant policies, including DP31 on mineral working exploration, extraction and processing. That covers issues such as human health, traffic and the local road network, water, biodiversity and other environmental matters.
Support/Other Comments:	**North Somerset Council Officer Response:**
The plan is sound with regard to the minerals related policies in the Plan, namely policies SP12, LP16, LP17, LP18, DP30 and DP31. The policies meet the legal requirements in terms of minerals by virtue of identifying sufficient potential construction aggregate resources during, and at the end of the Plan period and also in the safeguarding of working sites, ancillary operations and appropriate mineral resources. The minerals policies are sound as they have been positively prepared and are consistent with national policy in terms of allocations and safeguarding. The Duty to Cooperate has been met in the provision of crushed rock between North Somerset and South Gloucestershire. **(Tarmac Trading Limited)**	Comments noted and support welcomed.



Suggested modifications:
None.



LP17: Area of Search for minerals working – land at Downside Farm, south of Freemans Quarry

Policy LP17 Area of Search for minerals working – land at Downside Farm, south of Freemans Quarry	
Number of representations received: 3	
Number of objections based on policy being unsound: 0	
Not positively prepared: 0 Not justified: 0 Not effective: 0 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Support for the policy but the reference to "...the satisfaction of the council..." is unnecessarily vague. Though the need for a Minerals Assessment to be undertaken in such circumstances is referred to in the explanatory text it is not referred to by the policy itself. It is suggested, therefore, that the reference to the satisfaction of the Council be replaced with a reference to the need to submit a Minerals Assessment. (**Breedon Trading Ltd)**	Policy LP17 states that “Proposals should be phased to the satisfaction of the council”, which is considered appropriate. The justification to Policy LP17 does not refer to a Minerals Assessment because such assessments are more appropriately referred to in the justification to Policy LP18 on the MSA for carboniferous limestone, as they relate more closely to assessing the quality and quantity of minerals beneath a site as well as the practicality of extraction, than phasing.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support the policy in principle. **(Breedon Trading Ltd)**	Support welcomed.
The plan is sound with regard to the minerals related policies in the Plan, namely policies SP12, LP16, LP17, LP18, DP30 and DP31. The policies meet the legal requirements in terms of minerals by virtue of identifying sufficient potential construction aggregate resources during, and at the end of the Plan period and also in the safeguarding of working sites, ancillary operations and appropriate mineral resources. The minerals	Comments noted.



policies are sound as they have been positively prepared and are consistent with national policy in terms of allocations and safeguarding. The Duty to Cooperate has been met in the provision of crushed rock between North Somerset and South Gloucestershire. **(Tarmac Trading Limited)**	
Suggested modifications:	
The policy reference to the satisfaction of the Council should be replaced with a reference to the need to submit a Minerals Assessment. **(Breedon Trading Ltd)**	



LP18: Minerals Safeguarding Area for carboniferous limestone

Policy LP18: Minerals Safeguarding Area for carboniferous limestone	
Number of representations received: 2	
Number of objections based on policy being unsound: 0	
Not positively prepared: 0 Not justified: 0 Not effective:0 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Supportive of the policy but feel that the reference to "...the satisfaction of the council..." is unnecessarily vague. Note that although thought the need for a Minerals Assessment to be undertaken in such circumstances is referred to in the explanatory text it is not referred to by the policy itself. It is suggested, therefore, that the reference to "the satisfaction of the Council" be replaced with a reference to the need to submit a Minerals Assessment. **(Breedon Trading Ltd)**	Policy LP18 includes "the applicant can demonstrate to the satisfaction of the council" which is considered appropriate. This relates to a number of criteria in the policy, and it is appropriate that the Council assesses the applicant's submission which tries to demonstrate the criteria are met. The applicant's Minerals Assessment may inform their submission, but this does not remove the need for the Council to assess it.
Support/Other Comments:	**North Somerset Council Officer Response:**
The plan is sound with regard to the minerals related policies in the Plan, namely policies SP12, LP16, LP17, LP18, DP30 and DP31. The policies meet the legal requirements in terms of minerals by virtue of identifying sufficient potential construction aggregate resources during, and at the end of the Plan period and also in the safeguarding of working sites, ancillary operations and appropriate mineral resources. The minerals policies are sound as they have been positively prepared and	Comments noted.

are consistent with national policy in terms of allocations and safeguarding. The Duty to Cooperate has been met in the provision of crushed rock between North Somerset and South Gloucestershire. **(Tarmac Trading Limited)**	
Suggested modifications:	
That the reference to “the satisfaction of the Council” should be replaced with a reference to the need to submit a Minerals Assessment. **(Breedon Trading Ltd)**	



LP19: University of Bristol site in Langford

Policy LP19: University of Bristol Site in Langford	
Number of representations received: 2	
Number of objections based on policy being unsound: 1	
Not positively prepared: 1 Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Strong support for the policy aims which recognise the importance of the facility and support the new development opportunities that will enable the university to grow and accommodate necessary expansion in terms of student numbers and staff employment, but would like to see some minor wording changes to the policy which acknowledge its sustainability **(University of Bristol)**	Comments noted and support welcomed. The policy has been amended since its previous iteration in light of suggested changes from the University of Bristol, and we consider the policy as worded is now sound.
Concern that primary care infrastructure requirements have not yet been established on this site and that identified healthcare infrastructure needs should be reflected in this policy to ensure that the Local Plan has been positively prepared and is effective in capturing and communicating localised infrastructure needs. **(BNSSG Integrated Care Board)**	North Somerset Council meets regularly with the BNSSG ICB and are working with them to ensure necessary healthcare infrastructure is reflected in the Infrastructure Delivery Plan. Policy DP63 will apply to all new developments to ensure the delivery of infrastructure to support new developments, and as such does not need to be repeated in individual policies.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
Suggestion for modification to make the plan more positive in terms of the site's sustainability (although specific wording not suggested). **(University of Bristol)**	



Suggestion to include required healthcare infrastructure in the Policy.
(BNSSG Integrated Care Board)



LP20: Wyndham Way

Policy LP20 Wyndham Way	
Number of representations received: 8	
Number of objections based on policy being unsound: 4	
Not positively prepared: 4 Not justified: 3 Not effective: 2 Not consistent with national policy: 4	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 2	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that the policy requirements are too onerous and that it is unclear which provisions would relate to outline versus full applications. **(Persimmon Homes)**	Disagree. This is an overarching policy and it is clear that the principles listed are intended to apply to all development within the broad location.
Concern that the number of homes is not realistic or deliverable. This is aspirational and not deliverable. **(Persimmon Homes, Kath Scargill, C Miles, Aston & Co)**	This is a broad location for growth. The number of homes is taken directly from the evidence base work that underpins this broad location policy.
Object to the references in the policy to the Neighbourhood Plan **(Phoenix Life Ltd)**	There is no reference to the Neighbourhood Plan in the policy wording itself, the paragraph in the justification is there to provide context.
Concern from the BNSSG ICB that primary care infrastructure requirements have not yet been established on this site and that identified healthcare infrastructure needs should be reflected in this policy to ensure that the Local Plan has been positively prepared and is effective in capturing and communicating localised infrastructure needs. **(BNSSG Integrated Care Board)**	North Somerset Council meets regularly with the BNSSG ICB and are working with them to ensure necessary healthcare infrastructure is reflected in the Infrastructure Delivery Plan. Policy DP63 will apply to all new developments to ensure the delivery of infrastructure to support new developments, and as such does not need to be repeated in individual policies.
Support/Other Comments:	**North Somerset Council Officer Response:**
Queries regarding the status of the Wyndham Way Framework Study that is referred to in the policy, and whether other supporting evidence base work should be referred to and/or published.	The evidence base work is explained in the justification, and the council are content that the level of detail included is appropriate for this broad location policy.



(Persimmon Homes, Phoenix Life Ltd)	
Support the principles in the policy and the capacity figures as these are underpinned by the evidence base. **(Phoenix Life Ltd)**	Support welcomed.
Suggested modifications:	
Remove the Wyndham Way housing allocation (785), or safeguard this land, and allocate additional deliverable housing land to meet statutory need, such as Black Rock. **(Aston & Co)** Remove or significantly reduce the Wyndham Way housing allocation. Identify alternative land to make up the shortfall. **(C Miles)** The Local Plan policy and supporting text should be amended to clarify the status of the Wyndham Way Framework Study and therefore its use and the weight attached to it. The Local Plan should also consider whether the number of new homes is realistic and would amount to a mixture of new homes rather than predominantly flatted development. **(Persimmon Homes)**	



LP22: Epic Employment Campus

Policy LP22: Epic Employment Campus	
Number of representations received: 4	
Number of objections based on policy being unsound: 1	
Not positively prepared: 0 Not justified: 1 Not effective: 0 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Flood risk and climate change not mentioned in policy wording (but considered within the existing permission). **(Environment Agency)**	Flood risk and climate change issues have been addressed through the planning application and therefore it is not felt necessary to repeat then in the policy.
Support for the bespoke policy for the Epic Employment Campus and support the requirement that the site remains within the Green Belt but suggest amendments to the wording of the policy to better assist with the delivery of the development. Proposed alternative wording set out in the suggested modifications below. Epic Systems would like to expand the policy to include additional land north of Colliters Way which will be used to support the operation of the main campus development, and to remove this land, which they have assessed as grey belt, from the Green Belt. They have suggested additional wording to be included in the policy to incorporate this. **(Epic Systems)**	Support for the bespoke policy is welcomed. The suggested changes to the first part of the policy are not substantive changes required to make the policy sound and therefore it is not considered necessary to make these changes. In terms of the inclusion of the additional land north of Colliters way and its removal from the Green Belt, this land does not have planning consent, and it is not a proposed allocation. It is therefore not considered appropriate to include it within Policy LP22 or remove it from the Green Belt.
Objection to this development, the office development would be better placed in a city centre location. **(S Scott)**	The development has planning permission and therefore the principle of this development in this location is established. Policy LP22 recognises the planning status of the Epic Employment Campus and provides the framework for the planning consent to be implemented effectively.



Support/Other Comments:	**North Somerset Council Officer Response:**
Policy support is linked to the prioritisation of sustainable travel. Supportive of this position, as the applicant's proposals for sustainable travel and occupier-led travel initiatives was a key factor in National Highways accepting that the Epic development would have limited impact on the SRN. **(National Highways)**	Support noted and welcomed.

Suggested modifications:

Suggested re-wording of policy LP22:

This represents a unique opportunity to deliver high-quality employment use to bring significant economic benefits to the district and wider region. The site is located in the Green Belt and will remain so.

Within the boundary of the Epic employment campus, as defined on the Policies Map, ~~development~~ proposals for a campus style office development for Epic Systems will be supported ~~in line with the planning consents for this site~~.**where they**:

~~This represents a unique opportunity to deliver high-quality employment use to bring significant economic benefits to the district and wider region. The site is located in the Green Belt and will remain so.~~

~~Development proposals within the boundary of the Epic employment campus, as defined on the Policies Map, will be supported where they:~~

- Remain consistent or proportionate to the approved scale, use and intent of the extant permissions;
- Maintain or enhance the campus style character with high quality landscaping, open space and a low density built form;
- Retain the openness of the Green Wedge to the northern side of the site which will remain void of any above ground development and be accessible to the public;
- Demonstrate very high quality design in terms of massing, materials, and layout, ensuring visual integration with the surrounding countryside;
- Preserve the openness of the Green Belt;
- Deliver an exemplar employment location within the Green Belt; and
- Prioritise sustainable travel including the provision of active travel infrastructure, electric vehicle charging and links to public transport.

Land to the east of A4174 (as delineated on the proposed boundary for the Policies Map) will be safeguarded for Epic's use and operation subject to demonstrable need to support the operation of the main campus site. Where need is demonstrated, the

development of safeguarded land to the east of the A4174 will be permitted, subject to:

- **Satisfactory environmental safeguards including mitigation/compensation where appropriate**
- **No significant demonstrable harm to the amenities of nearby residents**

(Epic Systems Ltd)



LP23: Monaghan Mushrooms, Stock Lane Langford Broad Location

Policy LP23 Monaghan Mushrooms, Stock Lane Langford Broad Location	
Number of representations received: 4	
Number of objections based on policy being unsound: 1	
Not positively prepared: 1 Not justified: 1 Not effective: 1 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that expansion of development in this area would have an impact on nearby woodland which could have a detrimental impact on the North Somerset and Mendip Bats SAC. **(YACWAG)**	This broad location policy addresses the overarching principle of future development on this site. Matters such as impact upon protected species are covered by other policies in the plan, which will also apply.
Concern over how pedestrian and public transport links will be provided and funded. **(Paul Watkins)**	The policy sets out an appropriate level of detail for this broad location. This matter will be addressed at planning application stage.
Concern from the BNSSG ICB that primary care infrastructure requirements have not yet been established on this site and that identified healthcare infrastructure needs should be reflected in this policy to ensure that the Local Plan has been positively prepared and is effective in capturing and communicating localised infrastructure needs. **(BNSSG Integrated Care Board)**	North Somerset Council meets regularly with the BNSSG ICB and are working with them to ensure necessary healthcare infrastructure is reflected in the Infrastructure Delivery Plan. Policy DP63 will apply to all new developments to ensure the delivery of infrastructure to support new developments, and as such does not need to be repeated in individual policies.
Support/Other Comments:	**North Somerset Council Officer Response:**
Comment from the landowner supporting the policy, although requesting a modification to allow part of the site to come forward in advance of the relocation of the existing operations. **(Danbywiske Limited)**	Support welcomed. Wording change proposed to address this point.



Suggested modifications:
Modification requested: “Land within the Monaghan Mushrooms broad location site boundary as identified on the Policies Map is identified as a potential suitable area to accommodate additional housing growth as a result of redevelopment, **some of which** is subject to the successful relocation of the existing Mushroom Farm business operations being secured elsewhere within North Somerset.” **(Danbywiske Limited)**



Development Policies

Development Policies: Design and Place-making

DP1: High Quality Design

Policy DP1: High Quality Design	
Number of representations received: 17	
Number of objections based on policy being unsound: 12	
Not positively prepared:5 Not justified: 6 Not effective: 11 Not consistent with national policy: 8	
Number of objections based on policy being not legally compliant: 4	
Number of objections based on policy being not compliant with Duty to Co-operate 4	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that there is a lack of evidence and supporting documentation regarding the proposed designs for housing allocations in Congresbury – e.g. masterplanning, landscaping, local character/heritage assessment, green infrastructure. They feel that the current information available does not address any of the design considerations outlined in this policy. **(Adrian Mealing)**	Details regarding exact layout, house design etc will be decided at planning application stage for those sites that don't already benefit from consent. However, Schedule 1 of the local plan does set out certain site-specific requirements for the proposed allocations. This includes certain mitigation measures on the Woodhill Nurseries site to minimise the impact of development on Cadbury Hillfort. The plan also retains the Strategic Gap between Yatton and Congresbury to prevent coalescence of the two settlements.
Suggestion that the policy should be more flexible and reflect site specific circumstances, so suggest adding provisions such as "*as applicable*" or "*where appropriate*" to allow for more innovative design solutions. It is unnecessary for the policy to stipulate that major developments should include Design and Access Statements,	It is considered that the policy, as written, is flexible and allows for innovative design solutions if they are of a high quality. The Local Validation Lists reflect policy requirements and will be updated when the Local Plan is adopted.



parameter plans and Community Engagement Statements, as these documents are already required through local planning validation rules. **(Bellway Homes Ltd)**	
This policy should be more concise, focusing on the key aspects of high-quality design specific to North Somerset. The policy should refer to other national design guidance as necessary, placing additional detail within supporting text/supplementary planning documents (SPDs). It is also unnecessary for the policy to address matters covered by other policies (e.g. lighting). **(Bellway Homes Ltd, Bloor Homes - North of Pound Lane/Land at Portishead, Mead Realisations Ltd and Savills - on behalf of Taylor Wimpey, Crest Nicholson, Barratt Redrow and Vistry Group)**	The NPPF emphasises the importance of achieving well designed places stating "The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve" (para 131). Given this importance it is considered appropriate to have a sufficient level of detail in DP1 to ensure the delivery of high-quality design.
Public Art should be mandatory for any major development scheme, as it generates strong benefits for the local community. There is little need for the policy to justify the requirement for public art installations, as there is clear evidence that art creates better public spaces which are more inclusive for residents. **(Councillor Bridget Petty)**	Agreed. The policy requires that "*On major developments, proposals for high quality public art will be encouraged where they make a positive contribution to placemaking. Where provision of public art on-site is not appropriate, a financial contribution may be sought to support provision on or close to the site*"
The wording of this policy is seeking to give Supplementary Planning Documents (SPDs) the same weighting as the Local Plan itself. Policy development should only be through the Local Plan process, which has mandatory requirements for public consultation and independent scrutiny through the Examination process. Any reference to the SPD should be moved to the supporting text section. **(Home Builders Federation)**	It is proposed to update the reference to SPDs in light of new planning legislation and regulations and instead refer to supplementary guidance notes. Having the reference to supplementary guidance or other documents within the policy is acceptable.
The policy should specify when a management plan for the long term maintenance of shared public and private space/facilities should be submitted. It would not be appropriate to provide this level of detail at the outline planning application stage and a management plan should only be submitted once the principle of development has	Details regarding when management plans should be submitted will be discussed at planning application stage.



been approved. **(Mac Mic Strategic Land – all sites)**	
The policy should be rewritten, outlining which parts of it are relevant to outline proposals and what parts of design would be relevant to full applications/reserved matters. Having the policy test requirements relating to all aspects of design is unduly onerous for an applicant and that it would be more reasonable for a Design and Access Statement to address key design and function considerations of an application. Flexibility should be incorporated into the policy wording, as obtaining accurate management information may not be possible at the time of submission. **(Persimmon Homes)**	It would be too prescriptive to set out what elements of the policy apply at different stages of the planning application process, and it may vary depending on differing circumstances, sites and applications. Details regarding when management plans should be submitted will be discussed at planning application stage.
Paragraph 131 of the NPPF clarifies design expectations and how these will be tested. The use of the words '…*account will be taken of*..' in Policy DP1 is ambiguous and could cause unnecessary delay at the decision-making stage. **(Mead Realisations Ltd)**	Disagree, the words "account will be taken of" allows for flexibility in the approach to suit different circumstances and allows some flexibility in the design.
This policy lacks detail and associated timescales for delivering public art objectives. A strategy to deliver public art should be submitted by perspective developers during the planning application stage of developments to ensure it is delivered. **(S Scott)**	The requirement for public art on major developments is set out in the policy and the specific detail for delivery will be agreed at planning application stage.
Encourage new development in North Somerset to be designed in line with guidelines set out in Active Design (May 2023 - 3rd edition). It is an urban design guide which encourages people to be active and promote healthy communities. Recommend the use of the guidance in the master planning process for new residential developments and feel that it is applicable to this policy. **(Sport England)**	The policy states that development proposals should have regard to other design documents which could include Sport England's Active Design where appropriate.
Suggest rewording of the policy to include phrases such as "where appropriate" or "unless unfeasible" or to delete certain criteria. **(Savills - on behalf of Taylor Wimpey, Crest Nicholson, Barratt Redrow and Vistry Group)**	It is felt that the policy, as worded, provides an appropriate amount of flexibility to respond to differing circumstances without the need to include wording such as "where appropriate" or "unless unfeasible" which potentially weakens the policy requirements. Once the plan is adopted the

	local list will be updated to reflect the policy requirements.
Consider that the requirements for major development should not be set out in the policy, as these points should be covered by the formally adopted local list. This policy is inconsistent with a local list and that it does not provide sufficient flexibility. **(Vistry Group)**	Once the plan is adopted the local list will be updated to reflect the policy requirements.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support the policy and feel that incorporating the Active Design principles will help improve health and well-being in local communities, as well as address climate change and promoting active travel. **(Sport England)**	Support noted.
Commitment to the delivery of high-quality design and support a policy framework that achieves this objective. **(Savills - on behalf of Taylor Wimpey, Crest Nicholson, Barratt Redrow and Vistry Group)**	Comment noted.
Generally supportive of the policy and agree that this information should be provided by applicants. **(Mac Mic Strategic Land – all sites)**	Comment noted.
Developers must provide housing which is built to the highest possible specifications to maximise benefits for local communities. New housing should match the existing housing stock in terms of style and scale. (**R Storrar)**	Comment noted.
Suggested modifications:	
Proposed rewording: • '*The site integrates with the surrounding pattern of streets and paths, provides good links to public green and urban spaces and continues strong characteristic local development patterns where they contribute positively to local character including plot and building frontage widths*;' .. the words 'where appropriate' should be included at the end of this sentence as it will not always be appropriate or desirable to propose	



locally characteristic plot and building frontage widths as it may not be compatible with wider placemaking objectives.

- *'Proposals which are visible from main approaches into settlements should protect and enhance views from the approach, particularly regarding retention, provision, and/or enhancement of green areas, open spaces, trees and vegetation;'* It is considered that this policy requirement should only apply when the view is specific (or sequential) and of value. For green infrastructure and vegetation, the current wording offers no assessment of value, condition or mitigation, and there should not be a blanket presumption in favour of retention. 'Where appropriate' should be added to the end of the sentence.
- *'Proposals for lighting schemes should not have a harmful impact on the living conditions of residents, significantly increase sky glow, cause glare or light trespass or impact on biodiversity.'* Too imprecise and would prevent installing lighting that increases light levels or has any effect on biodiversity of any kind, which is unreasonable.
- '*The design promotes accessible and inclusive buildings and spaces with the design of the public realm, shared amenity spaces and entrances to public buildings being accessible to everyone*'..It is recommended that the phrase "unless unfeasible" be added to the end of the sentence as there may be circumstances where full accessibility for all users is not feasible e.g. operational requirements.
- '*Major development proposals should be accompanied by Design and Access Statements, parameter plans and Community Engagement Statements, providing evidence of effective community involvement in the development of the design. Management plans should be submitted for the long-term maintenance of all shared public and private spaces and facilities including private drainage installations and SuDS and services that the developer intends to provide instead of the council*.' Already covered by national and local validation requirements and should be removed.

(Savills - on behalf of Taylor Wimpey, Crest Nicholson, Barratt Redrow and Vistry Group)

DP2: Residential development within settlement boundaries

Policy DP2: Residential Development within Settlement Boundaries	
Number of representations received: 4	
Number of objections based on policy being unsound: 2	
Not positively prepared: 0 Not justified: 2 Not effective: 2 Not consistent with national policy: 2	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that the Congresbury housing allocations do not meet the residential standards set out in this policy and consider that there is a lack of evidence/technical studies to demonstrate that the objectives can be met. A masterplan for Congresbury should be produced demonstrating how these standards will be achieved across the three sites. **(Adrian Mealing)**	Policy DP2 is primarily to address infill development in existing residential areas. It is therefore not relevant to the proposed allocations in Congresbury.
The objectives of this policy are already addressed by Policy DP1, resulting in the unnecessary duplication of policies. The requirements are too vague and without quantification it is difficult to interpret. The policy should be removed. **(Bellway Homes)**	Policy DP2 is primarily to address infill development in existing residential areas and to address the specific issues faced by this sort of development. It is therefore considered necessary to have such a policy in addition to the high-quality design requirements set out in DP1.
Note that there is no mention or link of this policy to DP9 and SP2. **(Environment Agency)**	The plan should be read as a whole and therefore there is no need to cross-reference to other policies in the plan.
Concern that developers may not fulfil the expectations of this policy (e.g. reducing affordable housing rates or reneging on CIL charges). Seek assurances that the objectives of this policy will be enforced. **(R Storrar)**	Affordable housing contributions and CILL charges are dealt with under other policies in the plan, namely DP43 and DP63.



Support/Other Comments:	North Somerset Council Officer Response:
None	
Suggested modifications:	
None	



DP3: Residential extensions

Policy DP3: Residential Extensions	
Number of representations received: 2	
Number of objections based on policy being unsound: 1	
Not positively prepared: 0 Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that the three proposed housing allocations in Congresbury do not have the infrastructure or connectivity to meet Policy DP3's requirements. **(Adrian Mealing)**	Policy DP3 deals with residential extensions and is not relevant to the proposed housing allocations in Congresbury.
This policy does not mention or link with Policies DP9 or SP2. **(Environment Agency)**	The plan should be read as a whole and therefore there is no need to cross-reference to other policies in the plan.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
None	

DP4: Houses in multiple occupation and residential subdivision.

Policy DP4: Houses in Multiple Occupation and residential subdivision	
Number of representations received: 3	
Number of objections based on policy being unsound: 1	
Not positively prepared: 0 Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that the three Congresbury housing allocations fail to demonstrate compliance with Policy DP4. **(Adrian Mealing)**	Policy DP4 deals with housing in multiple occupation and residential sub-division and is not relevant to the proposed housing allocations in Congresbury.
Notes that this policy does not link with policies DP9 or SP2. **(Environment Agency)**	The plan should be read as a whole and therefore there is no need to cross-reference to other policies in the plan.
Support/Other Comments:	**North Somerset Council Officer Response:**
This policy is important and its strategy should be upheld to prevent cramped infill garden development. **(R Storrar)**	Comment noted.
Suggested modifications:	
None	

DP5: Climate change adaptation and resilience

Policy DP5 Climate Change Adaptation and Resilience	
Number of representations received: 17	
Number of objections based on policy being unsound: 13	
Not positively prepared: 6 Not justified: 8 Not effective: 10 Not consistent with national policy: 6	
Number of objections based on policy being not legally compliant: 3	
Number of objections based on policy being not compliant with Duty to Co-operate 2	
Main Issues Raised:	**North Somerset Council Officer Response:**
The three Congresbury allocations are not able to meet the requirements of the policy, and there is no evidence or infrastructure in the plan to enable this. The policy requires evidence demonstrating that the allocated sites can adapt to climate impacts, however insufficient evidence has been provided. **(Adrian Mealing)**	Planning applications on the sites allocated in Congresbury will be required to comply with the requirements of this policy, noting that some already benefit from consent.
Support the principle of the policy and its overall objective, however consider that a number of amendments should be required. **(Bellway Homes)**	Suggested modifications noted. It is not considered necessary to make these amendments as they would potentially lessen the ability for the policy to be implemented effectively.
The policy lacks specific metrics or targets for what constitutes adequate resilience. No clear guidance is provided on how 'adaptation' will be measured, enforced or managed over the long term. Supporting evidence on climate projections and water stress assessments for North Somerset is limited or absent and therefore appropriate measures for the locality cannot be identified and requirements are not justified. In the absence thereof, the review of Policy DP5 could not determine that the policy meets the tests of soundness as set out in NPPF Paragraph 36. The requirement in respect to nature-based solution is vague, with little or no information	This policy provides the framework, and sets the expectation, for how development should respond to and mitigate against the impacts of climate change. Further guidance on the detailed implementation of the policy will be provided, but it is appropriate that the policy also provides sufficient detail to ensure new development is resilient to the impacts of climate change.



about how the expected solutions would be required to demonstrate or monitor achievement of the intended benefits. It is noted than an SPD will be prepared to provide detail on how these policy requirements will be implemented, this is welcomed. Such guidance will need to be closely aligned with the evidence base and viability assumptions. **(Catesby Estates)**	
Query what a climate change adaptation statement would look like for smaller or minor developments. Concern that this will just make the planning process more difficult to navigate. Should only apply to developments over 10 dwellings, it will be an onerous requirement for small sites. **(Mike Tremlett, Dan Clarke-Hall Gibson Architecture)**	Climate change adaptation statements should be proportionate to the size of the development, but the policy sets the expectation that through the submission of a climate adaptation statement the future resilience of the development to the impacts of climate change has been considered.
Provisions of the policy and unduly onerous and place an unreasonable burden on applicants as well as officers determining applications, lack precision and are not consistent with national policy. **(Marcus Plaw Persimmon Homes, Mead Realisations)**	This policy provides the framework, and sets the expectation, for how development should respond to and mitigate against the impacts of climate change. Climate change adaptation statements should be proportionate to the size of the development. The policy justification states *"Much of the evidence provided within the climate change adaptation statement will also relate to other policy requirements… The climate change adaptation statement can therefore cross reference to the evidence provided to comply with these policies in the plan."*
Measures mitigating high temperatures are something that can be achieved through strategic planning and green infrastructure. It is unhelpful for the policy to use 'for example' more precision and clarity is required. **(Marcus Plaw Persimmon Homes)**	The words 'for example' allow for other methods for urban cooling to be considered/proposed giving the policy flexibility.
Air quality and nature-based solutions are matters that could be undertaken as part of a planning application. **(Marcus Plaw Persimmon Homes)**	The policy justification states *"Much of the evidence provided within the climate change adaptation statement will also relate to other policy requirements. This includes the requirements for minimising flood risk, provision of SuDs, enhancing and protecting green infrastructure, protecting best and most versatile agricultural land and the requirement for*



	Biodiversity Net Gain. The climate change adaptation statement can therefore cross reference to the evidence provided to comply with these policies in the plan."
Broadly supportive of the principle objectives of the policy, however concerns with the repetition within other subject focused polices, also concerns that the majority of climate change provisions are covered through part O of Building Regs. Concern that a future SPD could introduce more stringent requirements. Future additional guidance has the potential for confusion and is not a sound way of plan making. **(Homes England)**	It is important to have consideration of a range of measures that will improve climate resilience detailed in one report through the adaptation statement. The statement can specify whether the provision of covered by part O of Buildings Regulations. Future supplementary guidance will provide more detail in terms of the implementation of the policy and will not add further requirements.
Supportive of the aims of the policy, however much of the information required is likely to be submitted within Environmental Statements for major developments. Consider that there are better mechanisms to achieve this goal, the requirement is not justified and will add extra time and expense to the application process. **(Mac Mic – Backwell, Mac Mic Banwell)**	This is recognised in the justification to the policy which states: **"***"Much of the evidence provided within the climate change adaptation statement will also relate to other policy requirements… The climate change adaptation statement can therefore cross reference to the evidence provided to comply with these policies in the plan."*
Supportive of the need for climate change resilience, however, consider that these measures should be addressed at the design stage rather than with an additional report or statement and can be addressed in other supporting information and negotiated with officers. **(Mac Mic Flax Bourton)**	The benefit of having a climate change adaptation statement submitted with a planning application is that it allows the decision-maker to assess whether the proposed development includes the necessary measures to increase the resilience of the proposed development to climate change. This may cross-reference to other supporting information.
Support the principle of the policy, however the requirements to 'protect existing green and blue infrastructure and protecting existing biodiversity' should be removed, as the inclusion of the word protect implies to retain unchanged, and is therefore unnecessarily onerous, imprecise and therefore ineffective, nor does it take into consideration quality of such infrastructure. **(Taylor Wimpey, Crest Nicholson, Barratt, Redrow, Vistry)**	The expectation is that green and blue infrastructure will be protected. If there are circumstances when green or blue infrastructure should be replaced with better quality provision then that will be decided on a case-by-case basis.
To design to the absolute worse case (doomsday) scenario is unrealistic and far from pragmatic. **(R Burrows)**	The policy is future proofing development against the impacts of climate change which is in accordance with national guidance and the responsible approach.



Support/Other Comments:	**North Somerset Council Officer Response:**
Support this policy and welcome links to other requirements, and that an SPD will be prepared. **(Environment Agency)**	Comments noted
Support the objectives of this policy and the requirement to prepare a climate change adaptation statement to demonstrate how development aims to deliver long term climate resilience. (**Ainscough Strategic Land)**	Comments noted
All development needs to show that it can withstand substantial periods of rainfall, this particularly applies to isolated housing estates on agricultural land that border flood risk areas. **(R Storrar)**	Comments noted

Suggested modifications:

The policy begins that "All developments" should demonstrate compliance through such a statement, yet only sets out detailed expectations for major development, despite several items potentially being relevant to minor schemes. An alternative approach would be to list the requirements applicable to all development, with the caveat "as relevant", and require a specific, standalone climate change adaptation statement only for major development, thereby reducing unnecessary burden on smaller applications. The opening paragraph could be simplified by removing the phrase "which can form part of the sustainability/energy or the design and access statement." This explanatory detail is better placed within supporting text. The sentence referring to species selection for new trees and green infrastructure – "When incorporating new trees and other green infrastructure into new development, species should be selected which will be suitable in a changing climate." – could be removed.
(Bellway Homes)

The requirement for a climate change adaptation statement should apply only to "All development for 10 or more dwellings"
(Mike Tremlett, Dan Clarke-Hall Gibson Architecture)

Evidence to demonstrate how climate-related risks are to be addressed and reduced, through development proposals which **where applicable and appropriate:..**
Evidence to demonstrate that nature-based solutions, which enable carbon storage and provide flood resilience are integrated into proposals through development proposals which, **where applicable and appropriate**:..

- Protect existing and provide new green and blue infrastructure ~~where appropriate~~ including peatlands, wetlands and woodlands

(Catesby Estates)



DP6: Net zero construction

Policy DP6 Net Zero Construction	
Number of representations received: 35	
Number of objections based on policy being unsound: 27	
Not positively prepared: 11 Not justified: 22 Not effective: 23 Not consistent with national policy:` 23	
Number of objections based on policy being not legally compliant: 5	
Number of objections based on policy being not compliant with Duty to Co-operate 8	
Main Issues Raised:	**North Somerset Council Officer Response:**
Many respondents consider that Policy DP6 goes beyond the Future Homes Standard and building regulations without sufficient justification. Many refer to the December 2023 Written Ministerial Statement (WMS), which expects local plans not to exceed national standards unless robustly justified. The WMS dictates that any increase beyond the requirements of Part L should be expressed as a percentage uplift to the Target Emission rate, which is not the case in DP6. Despite legal judgements confirming that planning authorities can set their own standards, this can only be applied where there is clear robust and costed justification. The Government has published a clear road map for achieving zero carbon ready homes, as set out in the FHS, which will require carbon emissions to be 75-80% lower than current standards, new homes built under these standards will immediately be able to benefit from the decarbonisation of the electricity grid. **(Bellway Homes, Barratt Bristol, and Bloor Homes South West, Ainscough Strategic Land, Bloor Homes Pound Lane, McCarthy Stone & Churchill Living, Hallam Land, Wain Estates, Vistry Group, Various – Taylor Wimpey/Crest Nicholson/Barratt/**	The Council considers that the policy aligns with the objectives of the PPG, and the NPPF (2024). The 2023 Written Ministerial Statement is a material consideration but does not prevent a local planning authority from bringing forward policies that exceed national regulations. The Climate change and energy topic paper (Oct 2025) published to support the Local Plan sets out the council's approach to these matters.

Redrow/Vistry Group, Strongvox Ltd, Taylor Wimpey Youngwood Lane Nailsea, Stephanie Taylor, Rubix Strategic Limited, R Burrows, Nailsea Holdings LVA LLP, McCarthy Stone & Churchill Living, Marcus Plaw Persimmon Homes, Mac Mic Strategic Land, Kit Stokes, Homes England, HBF, Diverse Partnerships Yatton, Dan Clarke Hall, Catesby Estates, Diverse Partnerships Yatton, R Burrows)	
Many respondents raise concerns that the additional requirements of DP6 (e.g., ultra-low energy use, embodied carbon thresholds, on-site renewables) could threaten the financial viability of developments, especially for small and medium-sized sites and affordable housing. Some respondents point out that the policy's cost implications are not fully tested for viability, particularly for non-strategic sites. Concern that the council's viability evidence has underestimated the cost assumptions. The policy is not justified by proportionate evidence and provides no clear viability evidence that these expectations can be delivered across all development typologies, particularly affordable housing. There is a risk that it may impact on affordable housing delivery. **(Barratt Bristol, Catesby Estates, Woodstock Homes - Land West of Butts Batch, Wrington, Nailsea Holdings LVA LLP, Mac Mic Strategic Land Flax Bourton, Mac Mic Strategic Land, South West Housing Association Planning Consortium, Barratt Bristol, Catesby Estates, Gleeson Land, Kit Stokes, Home Builders Federation, Woodstock Homes, Dan Clarke-Hall, Ainscough Strategic Land)**	The Local Plan is supported by a whole plan viability assessment which has concluded that the requirements of this policy do not impact on the overall viability of the plan. Furthermore, the report for the West of England Authorities 'Embodied carbon of domestic and non-domestic buildings', (WSP 2021) demonstrates that significant reductions in embodied carbon can be achieved at no net additional cost. This can be achieved through better design (including durability to replacements), better onsite management (to avoid wastage), better choice of materials (with lower embodied carbon) and though the removal of unnecessary finishes.
Many responses claim that there is a lack of up-to-date, locally specific evidence to justify the policy's requirements, especially regarding grid capacity, infrastructure, and cost assumptions. The 2021 West of England evidence document should be updated and greater consideration given to supply chain capacity and likely costs. Information available to assess and reduce the embodied carbon of new development is unlikely to be available until detailed design	The Climate change and energy topic paper (Oct 2025) published to support the Local Plan sets out the council's approach and cross refers to a number of technical documents which support this policy and form part of the Local Plan evidence base. These include: • net zero new buildings policy evidence – December 2021 • operational carbon non-domestic - July 2021

stage. The requirement for on-site renewable energy demand will require off plot renewable energy and subsequently grid connections which result in complications over ownership, establishment of energy supply companies etc which are likely to preclude the technical and financial viability of achieving the policy requirement. **(Taylor Wimpey, Crest Nicholson, Barratt, Redrow, Vistry Group, Bloor Homes SW)**	• carbon offsetting report - June 2022 • carbon offsetting report - appendix B • carbon offsetting report - appendix A • Evidence base for West of England net zero building policy These documents form a recent, proportionate and robust evidence base.
Many respondents are opposed to including unregulated energy (energy use not controlled by the developer, such as appliances and EV charging) in net zero calculations. Respondents argue that developers can only influence regulated energy through design and specification and have no control of unregulated energy consumption. Suggestions that the policy should be updated to only refer to operational energy. **(Rubix Strategic Limited, Ainscough Strategic Land, Bellway, Bloor Homes SW, Barratt Bristol, Marcus Plaw Persimmon Homes)**	Based on the evidence summarised and presented in Climate Topic Paper (Oct 2025) the Council considers that including regulated and unregulated energy use within the policy is justified and proportionate. Other technical documents which form part of the Local Plan evidence base support this approach.
Many respondents felt that there should be greater flexibility in the policy to account for site-specific constraints, technical feasibility and the scale of development. There is concern that a one-size-fits-all approach could deter development, especially for small sites and self-build. It is suggested that not all criteria are applied to every development – there should be a more proportionate approach. **(Dan Clarke-Hall, R Burrows, Gleeson Land and Hallam Land, Homes England)**	The policy only requires an embodied carbon assessment on larger schemes (more than 50 dwellings, or in excess of 5,000m² non-residential floorspace) and provides alternative methods of demonstrating compliance such as Passivhaus Plus Standard accreditation and BREEAM Excellent Level accreditation.
Several respondents express concern that the policy lacks clarity on how compliance will be monitored and enforced, particularly for whole-life carbon and post-construction performance. In relation to embodied carbon, it needs to closely consider how it will be monitored and how not all emissions can be controlled by the housebuilding industry. Claims that there is limited information on methodologies, tools and reporting mechanisms to demonstrate compliance with policy requirements.	Further supplementary guidance to support the policy will be produced by the Council following adoption of the Local Plan which will set out in more detail implementation of the policy and how this will be monitored.



(Hallam Land, Catesby Estates, HBF, Andy Chappel)	
Referring to a future SPD is unreasonable as the content is unknown. **(Marcus Plaw Persimmon Homes)**	Further supplementary guidance to support the policy will be produced by the Council following adoption of the Local Plan.
Note that the embodied carbon figure has reduced from 900kg CO2e/m2 to 750kg from the previous reg 19 consultation but cannot see the evidence as to why this has reduced and the resultant impact on viability of schemes. **(Rubix Strategic Land, Barratt Bristol, Bloor Homes SW, Marcus Plaw Persimmon Homes)**	In order to ensure that these larger developments are demonstrating that embodied energy has been accounted for within their development, they will need to demonstrate that an upfront embodied carbon threshold of 750kgCO2e/m2 has not been exceeded. This threshold is considered to be the current industry standard and will have no adverse impact on development viability.
Carbon Assessments place unduly onerous requirements on applicants. **(Marcus Plaw Persimmon Homes)**	The approach in the Local Plan is that an embodied carbon assessment should be submitted alongside applications for developments of 50 or more dwellings and those in excess of 5,000m² to ensure the total carbon in respect of upfront emissions is at a level aligned with current construction industry practice, and that the target threshold has no adverse impact on overall viability.
Support/Other Comments:	**North Somerset Council Officer Response:**
The desire to go to net zero is essential and a very sensible policy. **(R Storrar)**	Comment noted.
The policy has been updated to require all residential development to achieve an estimated water consumption of no more than 110l/p/d in line with Part G of the Building Regulations. We welcome this amendment. **(Bloor Homes South West)**	Comment noted.
Suggested modifications:	
Suggested amendments: All new buildings will be required to achieve net zero operational energy compliance in respect of ~~both~~ regulated ~~and unregulated~~ energy and minimise embodied carbon.	

- All new development should seek to minimise embodied carbon in respect of both upfront (emissions associated with raw materials, transportation, manufacturing and construction) and whole life carbon. For development of more than 50 dwellings, or in excess of 5,000m² non-residential floorspace, full planning applications, or Reserved Matters applications, ~~proposals~~ must be accompanied by an embodied carbon assessment which demonstrate that upfront embodied carbon emissions do not exceed 750kg CO2e/m².
- In order to demonstrate compliance with the net zero operational energy requirement, all new residential buildings must demonstrate through an energy statement, that the following have been achieved:
    - No on-site use of fossil fuels;
    - Meet the requirements of the Future Homes Standard; and
    - ~~Ultra low energy use, to be demonstrated through: Space heating demand of less than 15kWh/m²/year~~
    - ~~Overall operational energy use of less than 35kWh/m²/year~~; and
    - On-site renewable energy generation is provided in line with the Future Homes Standard, ~~maximised, equivalent to at least the onsite energy demand.~~
- In order to demonstrate net zero operational energy, all new non-residential buildings must demonstrate through an energy statement, that the following have been achieved:
    - No use of on-site fossil fuels;
    - Energy use is minimised as far as practical and feasible, appropriate to the end use; and
    - On-site renewable energy generation is provided in line with the Future Buildings Standard ~~maximised, equivalent to at least the onsite energy demand; and~~
    - ~~The end users report their energy use in operation for five years post-completion.~~

Alternatively, compliance can be demonstrated by using BREEAM Excellent level accreditation, where feasible targeting an outstanding level for energy use (Credit Ene01). An alternative compliance route may be allowed with prior agreement.

Where feasible and viable residual energy demand should be met through the generation of onsite renewable energy, but if this is not technically feasible, the requirement may be met elsewhere by means of offsite renewable energy generation, either through a contribution to the Council's offsetting scheme or via a renewable energy generation scheme approved by the Local Authority.

All development must demonstrate measures to minimise potable water use. And Residential development should aim to achieve an estimated water consumption of no more than 100 litres/person/day, and non-residential development should aim to achieve the equivalent of 2 BREEAM Version 6 Wat 01 Water Efficiency credits. All measures will optimise water use systems and may include rainwater harvesting and other mechanisms for recycling and reusing water on-site.

All development will need to demonstrate measures to reduce the risk of the building overheating.



Energy use intensity and space heating targets should be prioritised regardless of any district heating connection and all reasonable efforts should be made to meet these requirements prior to buildings connecting to a district heating network. Connection to any district heating network should follow the guidance set out as part of the FHS and FBS to ensure development is connecting to low carbon heat.

(Ainscough Strategic Land, Bloor Homes, Bloor Homes South West):



DP7: Large scale renewable and low carbon energy

Policy DP7 Renewable and Low Carbon Energy	
Number of representations received: 4	
Number of objections based on policy being unsound: 2	
Not positively prepared: 1 Not justified: 2 Not effective: 2 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
The policy is not justified because the Plan does not provide any evidence that the three Congresbury allocations are capable of supporting on-site renewable energy at the scale required. **(Adrian Mealing)**	The Congresbury allocations are for residential use and therefore this policy does not apply.
There is no mention or link to DP9 or SP2. **(Environment Agency)**	The plan should be read as a whole and there is no need to cross-refer to policies.
Welcome the commitment to solar and wind energy generation, and strongly suggest the emphasis for solar should be moved to retrofitting rather than utilising green field space. The plan's delivery mechanisms are weak and do not provide confidence that its policies will be realised. **(Cleeve Parish Council)**	The policy states "Priority will be given to proposals with potential for positive cumulative impacts with other renewable energy schemes, developments on previously development land and solar photovoltaics on roof tops".
Support/Other Comments:	**North Somerset Council Officer Response:**
Broad support for North Somerset's intention to facilitate renewable energy development within its area through the Local Plan. This is compatible with this council's climate emergency declared in 2019. The plan notes North Somerset Wind Energy and Solar PV Supplementary Planning Documents will be updated to highlight	Comments noted and we will continue to work collaboratively with Bath and North East Somerset Council, particularly in terms of any future supplementary guidance produced to support the policy.



potential locations identified as most technically suitable areas for renewable energy schemes. Further dialogue on this matter would be welcomed should the approach change and given the sub-regional importance of renewable energy provision within the context of each authority's climate emergency declaration, in addition to the context of the landscape sensitivity/potential. **(Bath and North East Somerset Council)**	
Suggested modifications:	
None	



DP8: Efficient use of land

Policy DP8: Efficient use of land	
Number of representations received: 22	
Number of objections based on policy being unsound: 17	
Not positively prepared: 11 Not justified: 13 Not effective: 14 Not consistent with national policy: 15	
Number of objections based on policy being not legally compliant:1	
Number of objections based on policy being not compliant with Duty to Co-operate 4	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concerns raised regarding the wording of the policy and the 'minimum target density' of 40 dwellings per hectare. Note that the justification clarifies that 40dph is just an average and the appropriate density will vary depending on local circumstances, but concerns that this is not clear. Noted that the policy refers to this as both a minimum and an average figure. Greater flexibility is needed within the policy to ensure future developments are built at a density appropriate to local character, site constraints, and market requirements. **(Ainscough Strategic Land, Bloor Homes – Wolvershill/Land north of Pound Lane, Diverse Partnerships Yatton Ltd, Gladman Developments, Homes England, Mead Realisations Ltd, Stephanie Fowler – Land at White Oak House, Savills - on behalf of Taylor Wimpey, Crest Nicholson, Barratt Redrow and Vistry Group, Strongvox Ltd, Taylor Wimpey – Youngwood Lane, Wain Estates - Wolvershill)**	The policy justification states that "*the appropriate density will vary depending on local circumstances. Within accessible locations such as town and local centres and transport hubs there will be a presumption in favour of higher densities as this can help increase vitality and viability in these areas, support public transport and provide different types of accommodation."* It is felt that this provides adequate flexibility.
Concern over how the target densities mentioned in this policy link with Policy LP1 for the Wolvershill strategic site. Suggest references to density in policy LP1 cross-refer to this policy to avoid confusion.	The plan should be read as a whole and there is no need to cross-reference between policies.



(Ainscough Strategic Land)	
The policy does not link to or mention Policies DP9 and SP2. **(Environment Agency)**	The plan should be read as a whole and there is no need to cross-reference between policies.
Suggestion that the best place for large-scale new development is close to existing towns, as they feel this will avoid the creation of isolated communities with poor services. **(Cleeve Parish Council)**	The Spatial Strategy underpinned the residential allocation in the Local Plan is urban focussed locating new residential and mixed-use development in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active and sustainable travel, particularly at locations which are currently, or have the potential to be, well served by public transport.
The target development density should be higher than 40dph at more accessible locations but acknowledging that density should ultimately reflect local circumstances. On the draft housing allocation at Land off Elm Grove, Locking, imposing a minimum density of 40dph would not be in-keeping with the surrounding area, and therefore a slightly lower density of 36dph is proposed. **(Gladman Developments)**	The policy justification states that "*the appropriate density will vary depending on local circumstances*". The plan doesn't set out specific densities on a site-by-site basis and the appropriate density for this site will be determined at planning application stage.
Unclear whether the minimum target density of 40dph reflects requirements for on-site Biodiversity Net Gain (BNG) and the impact BNG may have on site viability. **(Home Builders Federation)**	The target is 40dph within the developable area. The justification does acknowledge that *"In many locations there will be a range of factors such as ecological, green infrastructure or heritage considerations which will influence the proposed density".*
Whilst the supporting text references 'net' density, suggest that this should also be reflected in the policy text itself. **(Homes England)**	It is felt that the policy and justification read together are sufficiently clear.
The Council should consider the benefits of higher density development around train station locations or places where new stations have been confirmed/are being considered. Higher density development should not be restricted by walking distance to transport hubs. **(Marcus Plaw Persimmon Homes)**	The policy justification states that *"the appropriate density will vary depending on local circumstances. Within accessible locations such as town and local centres and transport hubs there will be a presumption in favour of higher densities as this can help increase vitality and viability in these areas, support public transport and provide different types of accommodation."*
Some Local Centres in North Somerset are not in 'accessible locations' suitable for higher density development. Reference to	The expectation of the policy is that higher densities should be achieved at local centres where possible.

Wrington Local Centre which has very few bus routes, no rail services and no cycling infrastructure. The policy should be amended so only relevant Town/Local centres with suitable access permit higher density development. **(Tony Harden)**	
The policy is considered to be in contradiction with paragraph 130 of the National Planning Policy Framework (NPPF) as it fails to consider a site on its own merits and make optimal use of individual sites. Rather than seeking to establish fixed density ranges through the plan, it is recommended the authority encourages efficient use of land in the context of the five considerations specified under paragraph 129 of the NPPF. **(Savills on behalf of Taylor Wimpey, Crest Nicholson, Barratt Redrow and Vistry Group)**	The policy states that *"The minimum target density will be 40 dwellings per hectare, but this should be higher at accessible locations"*. This reflects para 130 of the NPPF. Furthermore, one of the plans strategic priorities is to deliver higher residential densities through good design, particularly at town centres, transport hubs and on brownfield sites.
It is felt that Policy DP8 is not supported by sufficient evidence to demonstrate which parts of North Somerset would be subject to higher target densities. The policy does not sufficiently account for reasonable alternatives, such as development proposals which improve the accessibility of a location. A specified minimum density figure of 40dph is not appropriate and flexibility should be maintained. **(Vistry Group)**	The policy requires a minimum density standard for the district, higher densities at sustainable and accessible locations and allows for densities to reflect and complement the character of the surrounding area. It is considered that this provides sufficient flexibility.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support the efficient use of land to deliver North Somerset's housing need over the Plan period. **(Ainscough Strategic Land)**	Comments noted.
Agree that it is desirable for all new development to ensure that effective and efficient use of land, informed by local context and the specific requirements of the development being considered. **(Bloor Homes South West – Wolvershill/Land north of Pound Lane, Nailsea)**	Comments noted.



Support draft Policy DP8 which sets out that the minimum target density will be 40 dwellings per hectares and the supporting notes which states that this is an average and the appropriate density will vary on local circumstances. **(Gladman Developments)**	Support welcomed.
Welcome the changes made to the policy wording and supporting text since previous representations with regards to density targets. **(Homes England)**	Noted.
Support for the efficient use of land policies and the minimum density of development at 40dph appears reasonable when balanced against local context. **(Marcus Plaw Persimmon Homes)**	Comments noted.
This policy is reflected in the Strategic Policies section of the draft Local Plan and having this policy is essential to prevent urban sprawl. **(R Snook)**	Comments noted.
Supports the intention of the Council to require developments to make effective and efficient use of land. **(Wain Estates - Wolvershill)**	Support noted.
Suggested modifications:	
Propose the insertion of the following line in the last paragraph of the policy wording: "*The minimum net target density will be 40 dwellings per hectare across developable areas, but this*…" **(Homes England)**	

DP9: Flood Risk

Policy DP9: Flood risk	
Number of representations received: 21	
Number of objections based on policy being unsound: 16	
Not positively prepared: 9 Not justified: 11 Not effective: 14 Not consistent with national policy: 12	
Number of objections based on policy being not legally compliant: 3	
Number of objections based on policy being not compliant with Duty to Co-operate 3	
Main Issues Raised:	**North Somerset Council Officer Response:**
The policy is unsound as the Plan allocates housing in Congresbury (notably Woodhill Nurseries, 100 homes) on land with flood risk implications without adequate plan-level evidence. **(Adrian Mealing)**	According to information held on flood risk sources, the proposed allocations in Congresbury are not subject to significant flood sources, e.g. that would trigger the requirement for the flood risk sequential test. The information held does indicate potential for some surface water flood risk affecting the Woodhill Nurseries site and this should be investigated at the planning application stage via a robust Flood Risk Assessment (FRA). This typically would not preclude development as more sensitive parts of the site could be avoided with development and an effective surface water drainage strategy implemented. Recent changes to the PPG also state that the sequential test may not be required where surface water flooding is present provided the development can be made safe for its lifetime.
Flooding appears to have low significance in the plan. Due to the issues in the county it was expected that it would have its own section. North Somerset Council need to acknowledge we are a very low-level lying region, prone to flooding. This needs much more in-depth analysis presented here, mitigation plans developed, and local infrastructure and deployment plans put in place. These mitigation strategies need to form part of each planning application. **(Churchill PC)**	Policy DP9 address this very issue. Furthermore, the local plan is underpinned by an updated Strategic Flood Risk Assessment Level 1 and 2 report, providing additional analysis and a level of detail that sits behind the local plan. In addition, national policy and this local plan policy require further flood analysis at planning application stage proportionate to the complexities and severity of flood risk on each site.

Noting the high proportion of North Somerset rated by the Environment Agency as in Flood Zone 2 & 3 there are concerns that national policy on housing development creates a pressure that cannot readily be safely met without applying the Exception Test. This in turn has an impact on the cost of development and so undermines the ability to provide low-cost housing to the percentages outlined in DP1. Claims that there is widespread concern that recent housing developments in Weston-super-Mare will become vulnerable to large-scale flooding in the future. It would be prudent to have some element in the local plan which ensures that, where the Exception Test has been applied, there is additional government support for underwriting the additional costs of making such developments more flood resilient. **(Cleeve PC)**	As a general principle, the increased cost of developing in flood risk areas is acknowledged. The local planning authority has defended a number of planning appeals (e.g. Lynchmead Farm, Weston-super-Mare and Rectory Farm, Yatton) where flood risk and the sequential test has been at the centre of debate. The sequential test seeks to ensure development is directed to areas at least risk to help avoid this issue, maximising the value of development and contribution to affordable housing, infrastructure and other benefits. Future flood risk is considered when planning for new development and it is understood that future investment to upgrade flood defences will be required. Where the Exception Test is applied, there is additional focus on ensuring the development is designed to ensure it is safe over its lifetime and this may include resilience measures. It is outside of the scope of the local plan to refer to potential Government funding in future for development resilience as suggested.
DP9 is unsound because, as drafted, it effectively requires the Sequential Test whenever land is in higher flood risk, even where a site-specific Flood Risk Assessment could demonstrate the development can be made safe and won't increase flood risk elsewhere. Claims that this approach does not reflect the recent PPG amendments, which indicate a proportionate approach and that the Sequential Test may not be necessary where the FRA clearly shows safety and no off-site risk. DP9 is too narrow in relying mainly on the Strategic Flood Risk Assessment and should explicitly allow wider/updated evidence (e.g., EA mapping and datasets, historic flood records, topographic surveys, and potentially computer flood modelling), noting SFRAs can be superseded by more detailed modelling. **(Diverse Partnerships Yatton Ltd)**	Policy DP9 includes the following: "Applying the Sequential Test <u>where required in line with the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG)</u>, including any future update or superseding national policy" (underlining added for emphasis) This allows the policy to keep pace, and alignment with any changes to national policy. It should also be noted that application of the test is discretionary on a case-by-case basis and often requires judgements to be made on the part of the decision taker.
Given the characteristics of the district, and lack of sustainable alternatives (compliant with the spatial strategy) that completely avoid flood zones 2 & 3 within their red line it is essential that the approach to the sequential test, as set out in policy DP9, is	The approach is guided by national policy, and paragraph 175 of the NPPF. There is discretion in the application of the sequential test in the circumstances being described to enable development that would be located on lower flood risk areas; however it is important that safe access



consistent with national guidance and provides a positive and pragmatic approach. Specifically, it is considered that the policy should make it clear that it expressly allows for a disaggregated approach when considering the need for the sequential test, which would facilitate development sites being brought forward where residential development is not proposed to take place in the areas at risk of flooding but other elements of the development – infrastructure/biodiversity/open space may be within the red line of an application. This would reflect a sequential approach and meet the national policy aim of preventing inappropriate development in areas of flood risk. **(Gleeson Land)**	and egress is enabled to development sites now and in the future. Further, there is discretion in the application of the test to cater for specific circumstances of a development proposal and any specific application would need to reasonably address this.
Portishead (especially along the B3124/High Street, Avon Way and Portishead Down/Tower Farm area) already floods during heavy rain, and development would worsen surface-water runoff because current fields (Portishead Down/ Tower Farm) act as a "sponge" that hold back water. Building in this location would reduce this storage capacity, increase flooding elsewhere, worsen road safety, and lead to property/infrastructure damage, higher insurance costs (or lack of cover), and potentially higher council tax. **(Julia Gregory)**	Tower Farm is not indicated to have any significant surface water flood risk, according to information held as part of the Strategic Flood Risk Assessment. There is no indication that flood risk should be a reason to avoid development in principle on this site. However, at the planning application stage a Flood Risk Assessment (FRA) would be required that would consider any flood risk issues related to the site as well as ensuring that flood risk would not be worsened elsewhere as a result of the development. This assessment should consider surface water flood risk including potential flow paths across the site and how these might alter as a result of the development proposed. This exercise then informs any proposed mitigation measures e.g. onsite attenuation to manage surface water. There is also a requirement in policy to ensure flood risk is not worsened elsewhere as a result of development and any development proposal would have specific planning conditions and/or obligations to secure implementation of any measures.
The wording of this policy is unduly onerous. It should be considered against the outcome of a Judicial Review into the grant of planning permission for the development of up to 190 homes at Yatton - whereby sites can be found to be acceptable in areas of flood risk where mitigation makes them safe for users/occupiers. At this time the Policy should align with NPPF and PPG. A defined area of	Policy DP9 includes the following: "Applying the Sequential Test where required in line with the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG), including any future update or superseding national policy"



search should be based on local circumstances and appropriate to the nature and scale of development and so seeking a district-wide site search is unreasonable, sensible, informed areas should be agreed between parties. Suitable sites should be for the same use and deliverable concurrently. The Policy should be explicit to reflect NPPF para 175 where if a development is shown to be safe and not increase flooding elsewhere then a sequential assessment is not needed. **(Persimmon Homes)**	This allows the policy to keep pace, and alignment with any changes to national policy. It should also be noted that application of the test is discretionary on a case-by-case basis. NPPF para 175 only allows for the sequential test to not be applied where vulnerable elements of the proposal are not within a higher flood risk area; not only if the development can be made safe. Regarding the appropriate search area, the policy provides for a bespoke search area based upon the catchment area for the type of development proposed. Note that minor proposed changes are recommended to align DP9 to national policy. Policy DP9 allows for a search area specific to the development proposal consistent with national policy.
Objection is raised to this policy which is claimed to be far too detailed and not aligned with national policy and guidance. **(Mead Realisations Ltd, Stephanie Fowler, Strongvox Ltd, Taylor Wimpey (Youngwood Lane, Nailsea))**	Policy DP9 is considered to align to national flood risk policy. It includes the following statement: “Applying the Sequential Test where required in line with the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG), including any future update or superseding national policy” This allows the policy to keep pace, and alignment with any changes to national policy. It should also be noted that application of the test is discretionary on a case-by-case basis. In terms of the detail, flood risk policy is a complex area of planning practice necessitating a sufficiently detailed policy. A proposed change is made to ensure the wording aligns to recent PPG changes.
Policy DP9 should differentiate between land at risk of fluvial (river) and tidal (sea) flooding. The policy is supported for fluvial flood risk, however for tidal flooding where sea defences exist, development within the flood plain should be permitted. **(Tony Harden)**	This approach does not accord with national flood risk policy and places development at increasing risk of flooding as sea levels rise, defence investment may not keep up, and a residual risk would always remain. The approach suggested would be at odds with the sequential approach to development.



Overly onerous requirements for small scale development. **(Ricki Burrows)**	National policy removes some flood risk requirements for change of use or householder development, but recognises the importance of prioritising land at lower flood risk for new development, and ensuring the safety of development over its lifetime. The changes suggested for DP9 to remove requirements for smaller scale development are not agreed, although it is always the case that evidence requirements will be proportionate and applicable to the scale and nature of the proposal.
Support/Other Comments:	**North Somerset Council Officer Response:**
Welcome the changes made in this iteration of the Plan including the recognition within the supporting text to proposals consistent with the allocated use in the Local Plan not requiring the application of the sequential test (subject to changes in flood levels). Suggest however that this should also be reflected in the policy wording itself. **(Homes England)**	Support noted, where a site has been proposed for development in the local plan in an area of greater flood risk, unless it is considered that this risk can be managed through the development of the site, a sequential test assessment has been applied at plan making stage and would not be required at application stage. Similarly, because the site will have been allocated, its inclusion in an overall sound local plan negates the need to demonstrate 'wider sustainability benefits to the community that outweigh the flood risk' – this too has been addressed at plan making stage. However, it would still be necessary to demonstrate through an FRA that the site will be safe for its lifetime with no off-site detriment.
Suggested modifications:	
To make DP9 sound, the Plan must include: • A full Sequential Test for the Woodhill Nurseries allocation, demonstrating whether safer alternative sites across North Somerset exist. • Detailed flood modelling and hydrological assessment for all Congresbury allocations, including cumulative impact. • A drainage and flood mitigation strategy addressing: surface water management, capacity of rhynes, runoff rates, climate change allowances. • Removal or modification of any part of an allocation lying in higher-risk zones where the Sequential Test cannot be passed. • Clear plan-wide policies ensuring no net increase in flood risk to Congresbury village or downstream communities. Without these modifications, DP9 remains unjustified and inconsistent with national flood policy. **(Adrian Mealing)**	



The policy must be brought up to date to reflect national policy/ planning practice guidance with respect to technical flood risk information and the matter of sequential testing.
(Diverse Partnerships Ltd, Persimmon Homes, Strongvox Ltd, Taylor Wimpey (Youngwood Lane, Nailsea)

Amend the wording of the Policy DP9 to make it explicit that a disaggregated approach is acceptable.
(Gleeson Land)

The following text within the Justification should be added to the main policy text:

For proposals consistent with the allocated use in the local plan, the sequential test will not be required if there have been no significant changes to the known level of flood risk to the site, now or in the future, which would have affected the outcome of the test applied at the plan making stage.
(Homes England)

Reassess Pill Green against the full requirements of DP9, including ancient/veteran tree protection, habitat connectivity, and bat corridor sensitivity. Sites where irreplaceable habitats or veteran trees cannot be realistically retained or protected should be removed from allocation.
(Kevin Payne)

Policy DP9: Suggested Rewording (Relaxing Tests for Minor Development): "For potential development sites in flood zone the following should be applied in relation to the Sequential and Exceptions test. In the 4 main towns of WsM, Portishead, Clevedon and Nailsea, sites of 9 or fewer dwellings are not required to pass the sequential test or the exceptions test". Smaller windfall sites could be exempt as delivery has stalled significantly, they are counted as part of the delivery targets but are likely to struggle. Regarding redundant ground floor premises (like those in W-s-M), the policy should be re-worded, or the accompanying Strategic Flood Risk Assessment (SFRA) guidance should be amended to allow the conversion and re-use of redundant ground floor premises with mandatory flood resistant and flood resilient measures. This is based on the argument that future governments and the LPA will provide funding to improve sea defences before flooding reaches a critical point. Deferring to the SFRA will allow that to change more flexibly than the LP.
(R Burrows)

Tower Farm should be removed from the plan.
(Julia Gregory)



DP10: Sustainable Drainage

Policy DP10: Sustainable drainage	
Number of representations received: 5	
Number of objections based on policy being unsound: 3	
Not positively prepared: 0 Not justified: 3 Not effective: 3 Not consistent with national policy: 3	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
The policy requires new development to incorporate sustainable drainage systems (SuDS), manage surface water, avoid increasing flood risk, protect watercourses, and demonstrate long-term drainage management. However, the Congresbury allocations do not include the evidence or infrastructure needed to demonstrate that DP10 can be applied. **(Adrian Mealing)**	Based upon information identified through the SFRA, the proposed allocations at Congresbury are not indicated to have significant flood risk, including surface water flooding. In addition, the approach to surface water risk is generally to manage the risk as part of the development proposal ensuing appropriate site layout and an effective drainage strategy for the site. This includes ensuring that there is no greater flood risk caused elsewhere.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support for this policy, particularly inclusion of “essential flood prevention works including drainage to be completed prior to first occupation”. Welcome the fact that protecting water quality is a factor across multiple policies within the North Somerset Local Plan. The LPA is encouraged to consult the latest 25-year statutory WXW Drainage and Wastewater Management Plan (DWMP) to identify infrastructure vulnerabilities, such as sewer collapse risks or ageing assets, so that development proposals can be aligned with current and future capacity. As addressed in policies D10 and DP13, the use of SuDS will help manage runoff and prevent nutrients entering the	Comments noted. NSC have engaged with both the Environment Agency and Wessex Water and agreed to ongoing engagement as developments proceed.



watercourse. The Local Planning Authority should prioritise the connection of new housing developments to the public sewerage system, rather than the use of private wastewater treatment works, to further support the prevention of nutrients entering the watercourse. **(Environment Agency)**	
Suggested modifications:	
Provide a Congresbury-wide drainage assessment identifying: existing system capacity, bottlenecks and constraints, required upgrades, exceedance routes, climate change allowances, downstream impacts. Produce site-specific SuDS feasibility studies for all three allocated sites. Demonstrate that SuDS can be safely accommodated given site slopes, permeable/impermeable surfaces, and watercourse locations. Include a strategy for SuDS maintenance and adoption, identifying responsible parties and funding mechanisms. Apply the flood risk Sequential Test to the Woodhill Nurseries site and modify or remove allocation where appropriate. Integrate drainage upgrade works into the Infrastructure Delivery Plan, with costing and delivery timescales. **(Adrian Mealing)**	

DP11: Rivers, watercourses and springs

Policy DP11: Rivers, watercourses, and springs	
Number of representations received: 5	
Number of objections based on policy being unsound: 5	
Not positively prepared: 2 Not justified: 3 Not effective: 3 Not consistent with national policy: 4	
Number of objections based on policy being not legally compliant: 2	
Number of objections based on policy being not compliant with Duty to Co-operate: 3	
Main Issues Raised:	**North Somerset Council Officer Response:**
The requirements of DP11 have not been properly applied to the Pill Green allocation. The site lies adjacent to Markham Brook and is subject to localised surface-water and fluvial–tidal interaction flood risk. The Parish Council notes that no robust sequential test has been carried out, and there is no evidence of safe access or egress during flood events, nor any assessment of downstream flood displacement. **(Kevin Payne)**	This comment is more relevant to the Pill Green site itself rather than the specific wording of DP11, but note that according to flood risk information the Council hold as part of the SFRA, there is not a significant flood risk issue at Pill Green. Notwithstanding the above, a site-specific Flood Risk Assessment would also be required at planning application stage and this is required to investigate flood risk issues specifically in the context of the development proposed, including its layout, proximity to nearby watercourses, and access and egress etc. There is no basis at plan making stage to apply the flood risk sequential test for this particular site.
Support the principle of protecting rivers, watercourses, and springs, but the policy is unsound because it duplicates matters already addressed by other policies and introduces requirements that are inappropriate for a Local Plan policy. The policy requires development proposals to enhance the setting and views of rivers and contribute to preserving and enhancing the physical, natural, historical, and culturally distinctive landscape of the North Somerset Levels and Moors. These matters are already comprehensively	Whilst the aims of the policy could be addressed by other policies e.g. DP1: High quality design, it is considered that there is merit in having a specific policy given the importance of these features within North Somerset. The policy is intended to relate to development proposals that specifically affect rivers and watercourses and may allow for planning obligations to achieve some of the objectives.



addressed by other policies in the Local Plan, including those relating to landscape character, heritage, and design quality. **(Mac Mic Strategic Land)**	
Objection to the provisions of this policy which combine technical and design related matters and which duplicates and/or go beyond other topic-based policies. Under separate legislation, development is not allowed to adversely affect watercourse water quality. It does not require additional planning policy as presented here. No indication is presented in respect of as to how improvements to watercourse corridors will take place when, for example, such corridors are in third party ownership. **(Persimmon Homes)**	Whilst the aims of the policy could be addressed by other policies e.g. DP1: High quality design, it is considered that there is merit in having a specific policy given the importance of these features within North Somerset. Such improvements would be considered on a case-by-case basis but could involve direct measures on a development proposal and/or planning obligations.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
We support this policy subject to changes: 1. The policy wording currently states “Active operations also include regular vegetation management by the Environment Agency and Internal Drainage Board to retain open water habitat and volume of water storage that supports the aquatic wildlife in times of drought and reduces risk to properties in times of excess water.” The wording should be changed to include: that riparian owners also responsible for regular vegetation management (Environment Agency powers are permissive). 2. The Flood Risk Activity Permit wording current states “The Environment Agency requires environmental permits for flood risk activities such as erecting structures like culverts in or over main rivers, or building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river.” The wording should be changed to include: a permit is required for works within 8m of a fluvial watercourse and 16m from tidally influenced watercourses. **(Environment Agency)** To make the policy sound, Mac Mic recommends removing requirements that duplicate other policies on landscape, heritage, and design, delete criteria relating to re-naturalisation and public access, as these are not appropriate for development management and limiting the policy to essential matters such as water quality, flood risk, and maintenance access, which are directly relevant to planning decisions. **(Mac Mic Strategic Land)**	

The policy should be amended to recognise that technical reports supporting planning applications will cover the relevant and important issues. Improvements offsite can be challenging due to ownership constraints and so should be carefully referenced in the Local Plan.
(Persimmon Homes)



DP12: Development in the Green Belt

Policy DP12: Development in the Green Belt	
Number of representations received: 12	
Number of objections based on policy being unsound: 6	
Not positively prepared: 1 Not justified: 2 Not effective: 4 Not consistent with national policy: 7	
Number of objections based on policy being not legally compliant: 3	
Number of objections based on policy being not compliant with Duty to Co-operate 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Note that there is no reference or link to Policies DP9 or SP2. **(Environment Agency)**	The plan should be read as a whole and there is no need to cross refer to policies.
Policy DP12 sets out statements which are erroneous and includes criteria which go beyond established case law on the matters to assess 'openness' and national policy guidance set out within the NPPF and PPG. Policy DP12's assessment criteria conflicts with case law by incorrectly stating that Green Belt openness must be judged on both spatial and visual grounds. Contend that requiring assessment of a development's visual impact is inconsistent with the Supreme Court ruling in *Samuel Smith Old Brewery v North Yorkshire County Council* [2020] UKSC 3, which confirms that 'openness' is not inherently a visual concept. As such, the policy's criteria may not always be relevant to assessing Green Belt development and that emphasising visual impact could represent a risk of future legal challenge. **(Catesby Estates)**	Policy DP12 appropriately indicates that openness of the Green Belt has both spatial and visual aspects. That is consistent with para 013 of national Planning Practice Guidance (PPG) on Green Belt, which states that "openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume". The PPG (dated 2025) has not been updated to reflect the case law (2020) and as such it is appropriate to rely on the Planning Practice Guidance.
The proposal is inconsistent with national policy, as this states that Green Belt boundaries should only be altered in exceptional	Policy DP12 is a policy to guide development in the Green Belt, not a policy which sets out changes to Green Belt boundaries. See responses to



circumstances and must not undermine the purposes of the remaining Green Belt. **(Emilia Leung)**	LP9: Extent of the Green Belt and SP7: Green Belt for commentary regarding Green Belt boundaries.
The Green Belt boundary revisions should be revisited to facilitate additional housing allocations. This may also result in a need to revise settlement boundaries again. **(Home Builders Federation)**	Policy DP12 is a policy to guide development in the Green Belt, not a policy which sets out changes to Green Belt boundaries. See responses to LP9: Extent of the Green Belt and SP7: Green Belt for commentary regarding Green Belt boundaries.
Policy DP12 contradicts itself with the following two statements. Page 139 states that outside of settlement boundaries and in the smaller settlements and hamlets which do not have a settlement boundary limited infilling is inappropriate development and likely to harm the openness of the Green Belt. However, the policy also states that infilling on previously developed sites in the Green Belt outside of the settlement boundaries is appropriate development provided it meets with certain listed criteria. Those infill sites will clearly be within the smaller settlements and hamlets and thus the above two statements should include a note to those exceptions which the policy lists on page 140 under the title "Redevelopment and infilling on previously developed sites in the Green Belt outside settlement boundaries'. **(P Abrahams)**	The policy is meant to be read as a whole, and developers promoting development on previously developed land will be able to refer to the relevant later part of the policy which states that "on previously developed sites (as defined in the NPPF) outside the settlement boundary limited infilling or partial or complete redevelopment is not inappropriate provided it would not cause harm to the openness of the Green Belt and the purposes of including land within it." That is consistent with the NPPF para 154 g. Therefore, it is appropriate that Policy DP12 also includes an early part which states "outside of settlement boundaries and in the smaller settlements and hamlets which do not have a settlement boundary limited infilling is inappropriate development and likely to harm the openness of the Green Belt".
The policy goes beyond the NPPF in that it includes a sustainability test for infilling on PDL, which is not in the NPPF. Therefore to be consistent with national policy the new local plan should either remove the sustainability criterion or ensure it is worded so to reflect that sites in a rural location would normally have a lesser sustainability criterion when compared to an urban location as per para 110 of the NPPF. The NPPF's non-inclusion of a sustainable criterion within the Framework for Green Belt infill but within Grey Belt might also suggest that there's a lower sustainability bar for Previously Developed Land within the Green Belt than within Grey	The NPPF (paragraph 7) states that the purpose of the planning system is to contribute to the achievement of sustainable development. It is therefore considered reasonable and appropriate to require infilling, or partial or complete redevelopment proposals, on PDL outside of settlement boundaries to be sustainable in terms of being well related to existing settlements and having safe and convenient pedestrian and cycle access to services, amenities and a bus or rail service.



Belt Land. Recent appeal decisions interpreting the 2024 National Planning Policy Framework (NPPF) have established that "sustainable location" for rural dwellings is a proportionate planning judgment rather than a rigid checklist that replicates urban mobility standards. Planning inspectors have found that because opportunities to maximise sustainable transport vary significantly between urban and rural areas, rural sites do not need to meet the same stringent accessibility benchmarks as urban ones. **(P Abrahams)**	
Objection to the 50% gross external floor area limit for building extensions in the Green Belt, because this rule is too rigid and contrary to national guidance for assessing development in the Green Belt as set out in paragraph 154 of the NPPF. This limit risks restricting extensions that could be reasonable and acceptable under national policy. Request for DP12 to adopt a context-based approach, so extensions are based on their individual merits rather than having a strict percentage cap. **(Kit Stokes)**	The 50% limit is considered to appropriately reflect para 154 c) of the NPPF which indicates that an extension or alteration of a building in the Green Belt is not inappropriate provided that it does not result in disproportionate additions over and above the size of the original building. An extension more than half the size of the. original dwelling is considered disproportionately large.
The policy does not properly consider the potential for 'grey belt' to deliver new homes in sustainable locations. The policy should review opportunities for development on the edge of settlements that are inset in the Green Belt, to enable proposals on land which does not contribute to the openness of the Green Belt nor compliments neighbouring land uses. When the policy refers to development "outside of settlement boundaries" it should explicitly state that it is referring to settlements within the Green Belt for clarity. **(Marcus Plaw Persimmon Homes)**	The policy is called Development in the Green Belt so it should be apparent from the policy title that references to settlements and their boundaries relate to settlements in the Green Belt. The policy explains how appropriately, those villages which do not contribute to the open character of the Green Belt have settlement boundaries and are excluded from the Green Belt, and that outside of those boundaries limited infilling is inappropriate development and likely to harm the openness of the Green Belt. That is consistent with the NPPF para 154. If land is deemed to meet the criteria of grey belt there is greater scope for development as set out in the NPPF para 155, but there is no need for

	Policy DP12 to repeat national guidance.
Concern that Green Belt release is inconsistent with national policy and undermines its purpose to prevent urban sprawl and safeguard the countryside. The housing allocation in policy SP7 at north Nailsea is unsound as it conflicts with policy DP12 and does not meet the NPPF's "very special circumstances" or "Golden Rules" for major development in the Green Belt. NSC should select a site closer to Bristol, where public transport is usable and practicable and would like no development to take place in the Green Belt. **(Nailsea Action Group)**	The Council prepared a Stage 2 Green Belt Assessment to support the Local Plan which found that the land north of Nailsea parcel made only a "weak" contribution regarding purpose A of the Green Belt, to check the unrestricted sprawl of a large built up area (Bristol). The Council has prepared a Schedule of North Somerset Green Belt changes setting out the exceptional circumstances for all the housing allocations in the Green Belt, including land north of Nailsea. Policy DP12 sets out requirements which must be met at the planning application stage, including the Golden Rules as set out in the NPPF.
Policy DP12 introduces multiple additional tests—such as separate openness assessments, design criteria, historic baselines and cumulative impact thresholds—that go well beyond NPPF Green Belt policy. This is a material departure from Chapter 13 of the NPPF and fundamentally inconsistent with national guidance. Object to the policy's treatment of design and landscape matters as part of the "openness" assessment, which imposes unjustified restrictions and risks preventing acceptable redevelopment or infilling on previously developed land. Policy DP12 should be amended to align strictly with paragraph 154 of the NPPF, ensuring that only the national tests are applied and that design and amenity matters are dealt with by other policies. **(Rachel Tadman - Tadman Planning Consultants)**	Policy DP12 appropriately indicates that openness of the Green Belt has both spatial and visual aspects, including form of the development, visual and physical impact etc. That is consistent with para 013 of national Planning Practice Guidance (PPG) on Green Belt, which states that "openness is capable of having both spatial and visual aspects". Policy DP12 is consistent with the NPPF para 156 which indicates that the Golden Rules apply to major development on "sites in the Green Belt subject to a planning application". The justification explains why the policy makes reference to original buildings as existing on 26 July 1985. "This is the date of adoption of the Avon Structure Plan which defined the extent of the Bristol and Bath Green Belt and has been used successfully by the council in previous local plans."
Policy DP12 is a repetition of national policy and that the first part of the policy could be deleted. **(Vistry Group)**	The first part of the policy usefully indicates the relevance and importance of national policy.
Support/Other Comments:	**North Somerset Council Officer Response:**
Strongly support the emphasis of this Policy to protect the Green Belt and feel that it gives clear guidance on what type of development is acceptable. **(Wrington Parish Council)**	Support welcomed.



Sports England stresses the importance of Green Belt land for outdoor sports facilities as it is typically open and close to large urban populations. It is often used for sports clubs looking to expand, especially for land-extensive sports like golf. Outdoor sports facilities can help maintain openness, acting as a buffer between urban and rural uses, and support brownfield regeneration. They note that rules against developing land in the Green Belt should allow exceptions for essential ancillary facilities, as long as they are acceptable in scale and do not conflict with the purposes of the Green Belt. Sport England encourages Local Plans to take a positive approach to sport to benefit community health and wellbeing. **(Sport England)**	Comment noted.
Suggested modifications:	
Policy should be amended to read: “Outside of settlement boundaries and in the smaller settlements and hamlets which do not have a settlement boundary, limited infilling is inappropriate development and likely to harm the openness of the Green Belt, unless it meets with one of the NPPF exception’s such as Previously Developed or Grey Belt Land”. Delete the criterions under infilling on previously developed sites and only insert "Infilling should not cause substantial harm to the openness of the Green Belt” so to be consistent with the latest version of the NPPF. Policy should be amended to read: “The remaining smaller settlements and hamlets have been assessed as having an open character which contributes to the openness of the Green Belt. Infilling in these locations would be inappropriate development in the Green Belt, unless it meets with one of the NPPF exception’s such as Previously Developed Land or Grey Belt Land” **(P Abrahams)**	

Development Policies: Transport

DP14: Highway safety, traffic and provision of infrastructure associated with development.

Policy DP14: Highway safety, traffic and provision of infrastructure associated with development	
Number of representations received: **14**	
Number of objections based on policy being unsound: 10	
Not positively prepared: 8 Not justified: 4 Not effective: 9 Not consistent with national policy: 7	
Number of objections based on policy being not legally compliant: 5	
Number of objections based on policy being not compliant with Duty to Co-operate 3	
Main Issues Raised:	**North Somerset Council Officer Response:**
Policy should cross reference to DP9 or SP2. **(Environment Agency)**	The plan should be read as a whole, and it is not necessary to cross reference to policies throughout the plan.
The policy does not mention quantifiable impacts of development such as increase traffic or solutions e.g. street lighting, pavements or traffic calming. These mitigations should be required through planning applications and delivered either as part of the scheme or via developer contributions. **(Churchill PC)**	The policy sets out the route by which developments will be approved and the approach to mitigation of traffic impacts. Impact and appropriate mitigations are typically site-specific requiring detailed design work and are not set out in advance of the planning process of proposed allocations. The Infrastructure Delivery Plan sets out larger scale schemes that have been identified through the plan process, more specific on site mitigations will be determined as applications come forward.
Concern regarding the proposed housing development at Portishead and the impact this will have on the local road network (A369, junction 19 on the M5, the B3124 which has a bottleneck in Weston in Gordano and Clapton Lane), particularly in terms of out-commuting and the fact that no mitigations are proposed in the plan to address this issue **(Julia Gregory)**	The Infrastructure Delivery Plan contains schemes that will mitigate network impacts within the Pill and Portishead area.



Concern regarding access road to Tower Farm allocation becoming congested as there is only one access route through the Downs on to Down Road with only one access route to the town centre along Avon way. Suggestion to have an alternative access route built from Tower farm to the bottom of the hill. **(Tim Manther)**	Details of development site access is reviewed and agreed through the planning application process.
Concern relating to issues local to Backwell and that the plan understates the serious issues relating to transport in the area. In particular it is largely silent on the major issues of traffic relating to the frequent closure of the M5 due to accident, incidents and road works. Little mention is made on the need to seriously invest in improving the use of the main rail link into Bristol by upgrading service frequency and improving stations such as Backwell. The plan should include a serious analysis of road traffic levels under various stress conditions and include proposals for the upgrading of the rail services in the area. **(John Polden)**	The Local Plan Transport Assessment and in particular the Nailsea and Backwell Transport Mitigations Strategy set out the strategy to deliver the Local Plan transport vision and mitigations required. The Infrastructure Delivery Plan contains schemes that will mitigate network impacts within the Nailsea and Backwell area.
Objection to Policy DP14 because it fails to reflect the need for different transport solutions for small-scale rural developments that are not significant, as required by para 110 of the National Planning Policy Framework (NPPF) which emphasises that development should provide safe and suitable access for all users, but it also recognises that the scale and nature of development should determine the transport requirements. DP14, as currently drafted, applies a one-size-fits-all approach that is disproportionate for modest rural schemes. Small-scale developments in rural areas should not be burdened with unrealistic transport obligations. As such DP14 should be revised to align with NPPF paragraph 110. **(Kit Stokes)**	Highway safety and development site access is reviewed and agreed through the planning application process where the impacts of individual developments are assessed and appropriate mitigations identified where required. This system is not a one size fits all.
Concern that the level of development around Pill (a 44% increase) is contrary to the policy as drafted because mitigation measures for junction 19 of the M5 and the A369 have not been fully identified and active travel, bus and trains will not be able to mitigate for the	The Pill sustainable transport note appended to the Transport Assessment identifies schemes required to support sustainable development, and the IDP contains schemes that will mitigate network impacts within the Pill and Portishead area. NSC has worked closely with National Highways to



increase in cars on the roads. **Lucy Byrne)**	identify appropriate mitigation for M5 J19 and it is agreed that a scheme is capable of being delivered to address the local plan growth.
Objection to DP14 being based on a 'Predict and Provide' model rather than a 'Vision and Validate' model which will lead to new development being required to provide for new road space and will lead to increases in commuting traffic. **(MacMic Strategic Land Backwell)**	The Vision and Validate approach has been built into the heart of the process for determination of development site impacts, trip rates have been determined for larger allocations and a process set out for discounting trips in line with the Vision. Planning applications will need to demonstrate that proposed developments, site designs/infrastructure and mitigations are considered appropriate for the delivery of the Vision.
Paragraph 6 of the justification which requires developments to contribute to funding the improvement of rail freight facilities, even where they are no direct benefits, does not meet the tests for planning obligations as set out in NPPF Paragraph 58. **(MacMic Strategic Land Backwell)**	This is not a policy requirement, and the justification does not require this in all instances. The justification states" A development may be required to contribute to funding the improvement of rail freight facilities…". This will be applied in circumstances where it is appropriate.
Objection to final sentence of the justification as it is felt this implies more road capacity would need to be provided at a local level which follows the Provide and Predict rather than the Vision and Validate approach. **(MacMic Strategic Land Backwell)**	Traffic impacts of developments (with adjusted trip rates following discounts for sustainable measures and internalisation having been applied) will assessed and where sever impacts are identified mitigations will be required to be developed. This is in line with the vision led approach whereby trip reduction and mode shift to active and sustainable travel options are promoted as a primary means of mitigating development impacts as opposed to creation of highway capacity in anticipation of demand.
The requirement for highway mitigation infrastructure to be delivered in an agreed timescale is unreasonable given the nature of development and the uncertainty of the planning process including the impact of other development that are permitted but not developed of under construction. Careful consideration should be given to the highways evidence – given that the strategic road network plays an important role in the deliverability of key development sites. **(Persimmon Homes)**	The Local Plan is underpinned by a robust evidence base that has assessed the implications of development in the Nailsea and Backwell area. It is considered that there needs to be an overarching strategy for the phasing of key infrastructure schemes alongside development especially where those schemes enable development to take place. Whilst such an approach requires some built-in flexibility e.g. to reflect the build-out of development, it is necessary to embed some phasing principles. Policy LP3 refers to phasing requirements at planning application stage, and this should be in the context of the Infrastructure Delivery Plan.
Concern that information relating to public transport in the Transport Assessment is incorrect and out of date, particularly regarding	Public transport routes are ever changing and regardless of the routing (either through the village of Pill or directly along A369) all busses will



busses along the A369 at Pill and Easton-in-Gordano. Concern regarding the impact of proposed development at Pill and Easton-in-Gordano in J19 of the M5 on the local road network. **(R Pike)**	pass through M5 J19 and the BSIP scheme areas. As such all bus and coach services will benefit from this scheme. The cumulative impacts of all local plan development is being consider with regards to M5 J19 rather than just the impact of Pill and Portishead. This is in recognition that site allocations further away e.g., Nailsea and Backwell and Woodspring (south west of Bristol), may also have an impact on this junction. This is a robust approach to determination of the likely impacts and development of appropriate mitigations.
The policy is unclear whether the infrastructure is off-site. The justification implies that it is and that developers are expected to make a contribution to highway infrastructure. For Nailsea and Backwell it is considered that this is unlikely to be sufficient for the strategic rail crossing to proceed and without a contribution from central government. In the current financial climate, government funding is considered to be unlikely. **(Wraxall and Failand PC)**	The policy does not indicate that mitigations are constrained to on-site, moreover it identifies impacts relating to the surrounding area/highway network and thus implies off site mitigations. The local plan identifies the need for mitigation and the likely routes to funding/delivery through the Transport Assessment and the IDP.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support for this policy, which is broadly in line with SRN policy set out in the DfT Circular 01/2022. Welcome reference to consulting National Highways on Transport Assessments for development with the potential to adversely affect the safe operation of the M5 motorway. Support the Local Plan approach of identifying and coordinating necessary infrastructure investment. However, for the avoidance of doubt, National Highways is likely to recommend planning conditions to secure transport investment should it be necessary to avoid unacceptable or severe residual impacts associated with any individual or cumulative development proposals. **(National Highways)**	Comment noted.



Suggested modifications:

Remove the Pill sites entirely from the plan or limit the number of houses to be in proportion with the size of the existing village in line with the NDP.
(R Pike)

That the Local Plan references the highways infrastructure confirming that it is robust and sufficient to deliver the housing allocations in a timely manner.
(Persimmon Homes)

The policy should be re-drafted to reflect the 'Vision and Validate' model.
(MacMic Strategic Land Backwell)

The requirement for development to contribute to the improvement of rail freight facilities even when there is no direct benefit should be removed from the policy.
(MacMic Strategic Land Backwell)

Reference to out commuting from North Somerset should also be deleted from the policy as it implies that a Predict and Provide model should be put in place.
(MacMic Strategic Land Backwell)



DP15: Active and sustainable transport

Policy DP15 Active and Sustainable Travel	
Number of representations received: 10	
Number of objections based on policy being unsound: 7	
Not positively prepared: 2 Not justified: 4 Not effective: 6 Not consistent with national policy: 4	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that the proposed allocations in Congresbury rely on active travel infrastructure which does not exist, is not funded and is not deliverable within the plan period. **(Adrian Mealing)**	BSIP will introduce improvements at Smallway. Traffic Calming and 20mph has been introduced throughout the village (excluding A370). The Infrastructure Delivery Plan (IDP) has been updated with inclusion of two schemes that improve Active Travel connectivity to the Strawberry line. Other smaller schemes relevant to individual sites, will be identified within the planning application process.
Concern regarding amount of development proposed at Nailsea and Backwell and the impact on the local road network (in terms of volume of traffic and damage to roads), particularly Hanham Way and The Causeway which is a short cut to and from Tickenham, Clevedon, the M5 and Portishead. Concern around impact on health due to increased noise and air pollution. Suggestion of providing a link road from A370 to Junction 20 of the M5 serving as a bypass for Nailsea and Tickenham. **(Barry Stirling)**	Development quantum and Local Plan allocations are sound. The Nailsea and Backwell Transport Mitigations Strategy has been developed and published, appropriate mitigations are set out within the Strategy and included within the Infrastructure Delivery Plan.
Suggested change to wording regarding active travel and EV charging points being ready prior to first occupation of each development or phase to ensure greater flexibility. Suggested new	Active travel infrastructure should be complete in both its connectivity and delivery phasing. This is critical for access for those who travel by walking, wheeling or cycling. Regarding EV charging, relevant phasing is



wording is: To ensure effectiveness, we suggest greater flexibility be incorporated, whilst not removing the basics of the policy: *"[…] ~~Fully completed active~~ **Active** travel infrastructure **which provides appropriate** ~~(providing complete connectivity to the~~ **an** existing settlement and/**or** within the new development) and EV charging points are expected to be available prior to first occupation of each **relevant** development or phase".* **(Bellway Homes)**	appropriate but should be complete and commissioned prior to occupation of each phase.
Homes England have sought to bring forward the delivery of a pedestrian and cycle friendly development at Locking Parklands in line with the approved Design Code for the site. However, this has been challenging at times by the approach of Council as Highway Authority in considering planning applications. Firstly, the Highways Design Guide (2020) imposes arbitrary 5.5m standard minimum carriageway widths for local access and minor access roads which further enhances the status of the car above sustainable modes. This is at odds with Manual for Streets 1 and 2. Secondly, the Council's Parking Standards SPD over provides for car parking and sometimes unnecessarily prioritises parking over sound design rationale which is seeking to create a sense of place and limit car parking provision. Request references within the policy which seek to allow the practical implementation of Policy DP15 and to also state that where proposals comply with Manual for Streets and evidence through tracking and Road Safety Audits that they are safe, then roads will be adopted by the Council. **(Homes England)**	The Highways Design Development Guide (HDDG) is in the process of being updated and it will refer to NSC's Place & Movement Framework and Place and Movement Design Toolkit. The latter gives examples of what highway infrastructure will consist of in different types of places - Urban Hub, Urban or Rural and different routes – Primary, Neighbourhood Distributor or Local Access. The aim of the toolkit is to balance the need for a sense of place with the need for movement. An active travel first approach is followed when considering planning applications, ensuring that pedestrian and cycle priority is reflected in highway design. The Parking Standards SPD includes a parking needs assessment tool to allow flexibility in parking provision dependent on local transport infrastructure and services. The previous SPD required the same parking provision in a rural or urban location. The current SPD allows for up to 95% reduction in parking provision. Highways adoption is not a matter for the local plan.
Objection that the travel hierarchy set out in the policy is inflexible and unrealistic and mitigation for existing deficiencies in public transport should not be pursued through this policy but through CIL	The Travel Hierarchy is sound and in line with National Guidance. Processes for funding public transport are determined through NPPF and

funds. Suggested modification that the policy does not set out a travel hierarchy and refers to CIL/S106 in relation to funding public transport **(Marcus Plaw Persimmon Homes)**	individual sites will be expected to make contributions in line with policy.
Support/Other Comments:	**North Somerset Council Officer Response:**
The policy requires new development to be designed and located to minimise the need to travel and support the prioritisation of active travel and public transport. It highlights that development will be expected to contribute to the delivery of sustainable transport strategies to manage the cumulative impacts of growth and is welcomed. **(National Highways)**	Support noted.
Suggested modifications:	
Suggested amendment to policy wording: *"[…] ~~Fully completed active~~ **Active** travel infrastructure **which provides appropriate** ~~(providing complete connectivity to the~~ **an** existing settlement and/**or** within the new development) and EV charging points are expected to be available prior to first occupation of each **relevant** development or phase".* **(Bellway Homes Ltd)**	

DP16: Active travel routes

Policy DP16: Active Travel Routes	
Number of representations received: 7	
Number of objections based on policy being unsound: 5	
Not positively prepared: 3 Not justified: 5 Not effective: 5 Not consistent with national policy: 3	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Delivery of the Gordano Greenway should be prioritised by the council and development of land at Black Rock can help deliver this active travel route. The draft policy's requirement to segregate cycle and pedestrian routes is not always necessary and should be amended to 'where appropriate'. **(Bloor Homes - South West)**	Gordano Greenway is included in the Infrastructure Delivery Plan. Contributions from development will be sought where appropriate to progress this route. The policy does not mandate segregation but identifies that segregation should in line with current DFT guidance. All schemes will be assessed individually on their own merits.
Concern that active travel connections cannot be guaranteed, and the Plan's delivery mechanisms are too weak to ensure improvements will be delivered alongside new development. Request for an active travel route between Cleeve/Claverham and Backwell to be included in Schedule 7 of the Plan to enable school students to travel to and from school in Backwell. **(Cleeve Parish Council)**	The active travel schemes being promoted are deliverable and mechanisms are in place to ensure developer contributions as sites come forwards. Claverham and Cleeve students will likely be within the catchment area of the proposed new school being planned for in Yatton. Improvements to active travel along the A370 corridor including connections to Backwell via rural lanes will be considered for delivery/contributions by individual planning applications.
The form and type of active travel infrastructure should be proportionate to its intended use, to prevent the delivery of 'overly engineered' infrastructure. New active travel infrastructure should predominantly be focused on replacing existing car journeys. Objection to the wording of the policy regarding equestrian users and feel that the line "*and where possible for equestrian users*" should be	Active Travel Infrastructure should be designed in line with National Guidance. All sites/routes will be considered individually and where there is a recognised need and/or desire to accommodate equestrian users, this should be accounted for in design. Some routes may have sections of, or



removed because horse riding can lead to conflict with other active travel users. Propose that this line is replaced in the supporting text with one encouraging applicants to only consider equestrian facilities in specific circumstances. **(Savills – on behalf of Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group)**	link to, existing Bridleways where equestrian use is currently permitted. Additionally, where recorded Public Rights of Way (footpaths) are to be improved and status changed for use by cyclists, then equestrian use should also be considered. In these cases, special consideration would be given to extending access rights to equestrians along the developed route.
Request for assurances that any active travel infrastructure near watercourses will have an appropriate buffer distance to ensure that access is retained for maintenance vehicles and in emergency situations. **(Environment Agency)**	Active travel infrastructure will be designed on a case-by-case basis after consultation with the relevant agencies, consideration of safety audit, topographical survey and detailed design to ensure that an appropriate balance is struck between delivering quality infrastructure and operational considerations of maintaining and managing the watercourse. Normally, any new active travel routes alongside a watercourse would most likely be on Environment Agency or Internal Drainage Board property. Therefore, all the appropriate permissions would need to be applied for, and the EA or IDB would specify their requirements as part of this process.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support the principle of the policy that existing active travel routes will be safeguarded and agree that where appropriate, new development proposals should provide direct, safe and secure links to existing or proposed active travel routes. **(Bloor Homes)**	Support noted.
Most of the policy is supported by these developers, who recognise the benefits of integrating active travel infrastructure into new development proposals. **(Savills - on behalf of Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group)**	Support noted.
B&NES welcome the opportunity to work collaboratively on active travel infrastructure, particularly in linking the proposed Strawberry Line extension with B&NES' Active Travel Masterplan. This connection would provide a strategic, high-quality route for walking and cycling between communities, supporting both leisure and utility	Noted and agreed.



trips. **(Bath and North East Somerset Council)**	
Suggested modifications:	
The line "*and where possible for equestrian users*" should be removed. **(Savills – on behalf of Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group)**	



DP17: Public transport accessibility

Policy DP17: Public Transport Accessibility	
Number of representations received: 10	
Number of objections based on policy being unsound:9	
Not positively prepared: 5 Not justified: 7 Not effective: 9 Not consistent with national policy: 6	
Number of objections based on policy being not legally compliant: 3	
Number of objections based on policy being not compliant with Duty to Co-operate 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that the housing allocations surrounding Congresbury are in areas with poor and unreliable public transport and that no improvements to upgrade public transport have been secured or funded within the Local Plan. Existing bus stops in Congresbury are often inaccessible, lacking proper footways and crossing points for pedestrians to reach them. **(Adrian Mealing)**	There are planned works to improve bus infrastructure and provision of crossing at A370/B3133 Smallway. The Infrastructure Delivery Plan identifies two schemes in Congresbury that provide improved access to the Strawberry Line. Improvements relating to access to public transport from individual sites or the need to contribute towards public transport service improvements will be considered within the planning application process for any sites that do not yet have consent.
A 'reasonable walking distance' to public transport services and bus service frequencies should be more adaptive to site-specific circumstances. Suggestion that the policy guidance referring to 'reasonable distance' and 'appropriate bus service frequency' should instead be referred to as 'typical distance' or 'typical bus service frequency' to account for site specific circumstances. **(Bellway Homes Ltd)**	Policy wording is in line with NPPF guidance. Individual sites will be assessed for the need to provide improved access to public transport or service improvements within the planning application process.
The wording of the policy in relation to the bus service 'target frequencies' based on population size is too ambiguous and it is unclear how these targets would be applied in a non-residential setting. Request justification for these frequencies stated in the	Policy wording is in line with NPPF guidance. Individual sites will be assessed for the need to provide improved access to public transport or service improvements within the planning application process. Public transport service provision for Bristol Airport will continue to be guided by



policy and feel that the wording of the policy, regarding how these targets will be applied in a way that is proportionate to the scale of the development proposed, needs to be clarified. **(Bristol Airport)**	ASAS and mode shift targets as set out in planning consent.
There has been a decline in public transport services over the past few years, despite an increase in housebuilding in the area, leading to an increase in traffic on local roads and worsening conditions for pedestrians. Concern that the current frequency of bus services and routes available do not satisfy demand and that there won't be enough funding available to make improvements. It is also suggested that current funds to improve public transport in the area are being spent unwisely. There is a need to ensure regular bus services around villages where housing is proposed to key destinations (e.g. Bristol, Weston-super-Mare). **(Churchill Parish Council)**	Provision of bus services and any development contributions/ support will be determined at the planning application stage and based on individual sites. The Vision Led approach supports a mode shift to Public Transport and in particular the need to target improvements to infrastructure and services on key transport corridors. The A38 corridor (Weston-super-Mare – Bristol) is well placed for improvements with proposed growth on route (Wolvershill, Churchill/Langford/ Bristol Airport, Woodspring) supporting improved provision.
There is concern about basing public transport accessibility on 'reasonable walking distance' to a bus stop and feel that it should be based on the level and frequency of public transport services instead. The current metric will be detrimental to/exclude sites where larger walking distances apply and suggest the wording of the supporting text relating to 'reasonable walking distance' be amended, so it also considers the topography of a site. **(Mac Mic Strategic Land, Flax Bourton/Land north of Banwell Road/ Backwell)**	Policy wording is in line with NPPF guidance. Individual sites will be assessed for the need to provide improved access to public transport or service improvements within the planning application process.
Support/Other Comments:	**North Somerset Council Officer Response:**
There is agreement with the overarching principle that all residential development should be within a reasonable distance of a direct and frequent bus service and that new developments will be expected to encourage the use of public transport. **(Mac Mic Strategic Land, Flax Bourton/ Land north of Banwell Road/ Backwell)**	Comment noted.



Welcome the policy requirement that residential development should be within reasonable distance of a direct and frequent bus service providing access to a good range of facilities, services and job opportunities. **(Churchill Parish Council)**	Comment noted.
Support for the overall objective of this policy to deliver improved public transport accessibility. **(Bristol Airport)**	Support noted.
Support for the general aspirations of the policy. **(Bellway Homes Ltd)**	Support noted.
Suggested modifications:	
Would like the wording of the supporting text relating to 'reasonable walking distance' amended, so it also considers the topography of a site. **(Mac Mic Strategic Land, Flax Bourton/Land north of Banwell Road/ Backwell)** Would like justification for bus frequencies stated in the policy and feel that the wording of the policy, regarding how these targets will be applied in a way that is proportionate to the scale of the development proposed, needs to be clarified. **(Bristol Airport)**	



DP18: Travel plans

Policy DP18: Travel Plans	
Number of representations received: 1	
Number of objections based on policy being unsound: 0	
Not positively prepared: 0 Not justified: 0 Not effective: 0 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
The policy wording could be amended to refer to the requirement to monitor Travel Plan outcomes and implement remedial actions should any Travel Plan fail to achieve its aims. **(National Highways)**	The council currently have two options for the implementation of Travel Plans. Option 1 is for the developer to pay NSC to implement most aspects of the Travel Plan. This option is available for use class B1 (Business) and C3 (Dwelling houses), with other development types considered on a case-by-case basis if requested. Under Option 2, the owner/developer retains responsibility for managing and implementing the Travel Plan and pays a non-refundable monitoring fee as well as a taking out a bond for remedial work. This is available for all Class Use developments. These options are currently set out in the adopted SPD and it is intended for this approach to continue and be set out in any future supplementary guidance to support this policy.
Support/Other Comments:	**North Somerset Council Officer Response:**
National Highways stresses the importance of having Travel Plans for all developments which will generate significant volumes of traffic and including planning conditions or obligations to ensure that a Travel Plan is adopted prior to the occupation of a development. They also acknowledge that a future Supplementary Planning Document (SPD) will set out more details in respect of the	Comments noted. Recent changes in planning legislation and regulations make no provision for the formulation and adoption of SPDs. As such it is intended to set further details out in a Supplementary Guidance Note.



development, implementation and monitoring of individual Travel Plans. **(National Highways)**	
Suggested modifications:	
The policy wording could be amended to refer to the requirement to monitor Travel Plan outcomes and implement remedial actions should any Travel Plan fail to achieve its aims. **(National Highways)**	



DP19: Parking

Policy DP19: Parking	
Number of representations received: 2	
Number of objections based on policy being unsound: 2	
Not positively prepared: 2 Not justified: 2 Not effective: 2 Not consistent with national policy: 2	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Objection to policy requiring car clubs on schemes in highly accessible location where reduced parking may be acceptable. Suggest removing this requirement from the policy. **(Gleeson Land)**	The policy states that reduced provision for parking maybe acceptable provided certain criteria are met – mainly that the scheme is in a highly accessible location, well integrated to the existing settlement, has easy and direct access to local facilities via active travel, is well served by public transport and should have access to a car club. North Somerset Council feel it is reasonable to expect developments which have reduced parking provision to have a variety of other transport options available to residents, including access to a car club.
Objection is raised to this policy as the required parking standards should be included within the text. A mechanism for amending the standards (should that be necessary in the future) should also be included. **(Mead Realisations Ltd)**	Parking standards will be set out in further guidance which allows for the flexibility to update or amend as required. It is not clear what 'mechanism' is being referred to for updating standards that are incorporated into an adopted development plan.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	



Suggested modifications:
Remove requirement for car clubs from the policy. **(Gleeson Land)** The required parking standards should be included within the policy text. **(Mead Realisations Ltd)**

DP20: Airport related car parking

Policy DP20: Airport Related Car Parking	
Number of representations received: 4	
Number of objections based on policy being unsound: 1	
Not positively prepared: 0 Not justified: 1 Not effective: 1 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that the wording of Policy DP20 is too ambiguous and that it implies that car parking can deliver improved public transport: "*Any car parking provision, within the airport boundary as defined on the Policies Map, should be designed to deliver improved public transport to and from the airport, reducing reliance on private vehicles and will only be permitted where it does not undermine the objectives of the Airport Surface Access Strategy and the Joint Local Transport Plan*." The intent behind the requirement for car parking provision and how this links with improved public transport should be clarified by North Somerset Council and amended wording for this part of the policy should be considered. **(Bristol Airport)**	DP20 should be read alongside LP12 which provides additional information regarding Airport site activity and also covers how potential future expansion would be consider. We accept that as worded the reference to design is confusing and propose a minor wording change to this part of the policy for clarity.
Priority should be given to measures that enhance sustainable access to the airport such as improved bus and mass transit connectivity and active travel infrastructure for staff, rather than expanding car parking provision. Any parking proposals should be conditional, dependent on delivering long-term improvements to public transport in line with the Airport Surface Access Strategy and	Policy should be read in conjunction with LP12. This clearly sets out the need to improve access with a strong focus on public transport. The policy also sets out the position in the event of future airport passenger growth above the currently permitted 12mppa.

the Joint Local Transport Plan and robust monitoring and enforceable targets should be considered as part of this policy. **(Bath and North East Somerset Council)**	
This policy should place more emphasis on the need to improve public transport links to the Airport, to reduce the potential need for offsite airport parking unrelated to passenger/employee accommodation. Otherwise there may be negative impacts on local residents and the environment. **(Wrington Parish Council)**	Policy should be read in conjunction with LP12. This clearly sets out the need to improve access with a strong focus on public transport. The policy also sets out the position in the event of future airport passenger growth above the currently permitted 12mppa.
Acknowledge that Airport related parking (including off-site park and ride provision) outside of the boundary will only be permitted where there is a demonstrable need and it is consistent with the aims and objectives of the Airport Surface Access Strategy and the Joint Local Transport Plan, but concern that efforts to increase sustainable travel initiatives could be undermined by any off-site satellite parking facilities which encourage private car usage. **(National Highways)**	The policy is clear that proposals that do not fall within the airport boundary as defined on the Policies Map, airport-related parking (including any future off-site park and ride provision) will only be permitted, where it is justified by a demonstrable need and is consistent with the aims and objectives set in the Airport Surface Access Strategy and the Joint Local Transport Plan, particularly in respect of improving the sustainability of surface transport access to the airport and reducing congestion on the local road network. The policy then lists criteria which off-site airport parking would have to meet.
Support/Other Comments:	**North Somerset Council Officer Response:**
Strong support for the principle that airport related parking must not undermine any transport modal shift objectives. **(Bath and North East Somerset Council)**	Comments noted.
Supportive of the policy's efforts to encourage sustainable travel usage and welcome the requirement that parking proposals outside of the Airport boundary should not result in severe unmitigated residual cumulative traffic impacts, create significant constraints which impact the delivery of public transport options, or impact the viability of other allocated sites within the Local Plan. **(National Highways)**	Comment noted and support welcomed.



Suggested modifications:
Modify second paragraph of policy regarding car parking design and improvements to public transport to clarify meaning and implementation. **(Bristol Airport)**



Development Policies: Economic Development

DP21: Safeguarded employment sites

Policy DP21: Safeguarding Employment Areas	
Number of representations received: 4	
Number of objections based on policy being unsound: 3	
Not positively prepared: 1 Not justified: 1 Not effective: 3 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Draft Policy DP21 seeks to safeguard employment sites other than those allocated for other purposes. On this basis and by definition this policy should not apply to the Wyndham Way Broad Location which is allocated for mixed use in the Reg 19 Plan at Policy LP20. Clarification is required in order to make the Local Plan sound as in this respect it is not effective (deliverable, flexible and able to be monitored). **(Phoenix Life Ltd)**	DP21 provides a clear allowance for sites allocated for other purposes and the Wyndham Way Broad Location policy refers to the Development Framework that sets out a strategy for the entire area. Together these provide a sound basis for the regeneration of the Wyndham Way Area.
Marketing requirements are onerous for small/remote sites with only 2-3 B2/B8 units. **(Dan Clarke-Hall Gibson Architecture)**	Marketing requirements are considered a sound basis for assessing market demand and small units play a key role in the local economy. The specific requirements of any marketing exercise can be discussed at pre-application stage and if necessary tailored to the specific circumstances. However, it is not considered justified to remove the requirement altogether.



Support/Other Comments:	**North Somerset Council Officer Response:**
Agree with this policy. The changes from Use Class E to C3 residential as permitted development is concerning in high flood risk areas. **(Environment Agency)**	Support noted.
Suggested modifications:	
Draft Policy DP21 seeks to safeguard employment sites other than those allocated for other purposes. On this basis and by definition this policy should not apply to the Wyndham Way Broad Location which is allocated for mixed use in the Reg 19 Plan at Policy LP20. Clarification is required in order to make the Local Plan sound as in this respect it is not effective (deliverable, flexible and able to be monitored). **(Phoenix Life Ltd)** Exempt small sites from marketing requirements. **(Dan Clarke-Hall Gibson Architecture)**	



DP24: Town centres

Policy DP24: Town Centres	
Number of representations received: 5	
Number of objections based on policy being unsound: 1	
Not positively prepared: 1 Not justified: 1 Not effective: 1 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Ground floor flats and sleeping accommodation should be avoided in line with guidance in the Level 1 SFRA. **(Environment Agency)**	Issues relating to flood risk are covered in other policies specifically DP9: Flood Risk.
The policy for town centres does not clearly outline the need for more investment in these 'new towns' it's effectively creating. In locations such as Pill, there are limited resources and services to sustain the existing population, and the cost of providing these services will be exceptionally high. **(Lucy Byrne)**	This policy relates to existing town centres. As an aside, in response to the comment, the Local Plan Infrastructure Delivery Plan identifies the appropriate infrastructure necessary to deliver the proposed developments in the plan and sets out funding sources and timescales.
Broadly agree with the sentiment and proposals for development at Nailsea Town Centre, although concern about access and parking. **(Nailsea Action Group)**	Comments noted. Parking and highways issues are covered by other policies in the plan.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support policy DP24. **(Phoenix Life)**	Support welcomed.



Suggested modifications:
None



DP26: Local centres

Policy DP26: Local Centres	
Number of representations received: 1	
Number of objections based on policy being unsound: 1	
Not positively prepared: 0 Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Wrington has an identifed local centre, where it is important to maintain viability and vitality, yet no housing allocations are proposed at Wrington. **(Woodstock Homes)**	Other more suitable sites have been selected to meet the Local Plan housing requirement and as such new housing allocations are not proposed at Wrington.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
None	

DP30: Control of non-mineral development

Policy DP30: Control of non-mineral development	
Number of representations received: 2	
Number of objections based on policy being unsound: 1	
Not positively prepared: 0 Not justified: 0 Not effective: 1 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Support the policy as far as it goes, but its reach should be extended to cover Preferred Areas or Preferred Areas of Search, otherwise effectiveness is reduced as it would be possible for non-mineral development to potentially sterilise these areas. **(Breedon Group)**	The policy as drafted is considered acceptable. The comment is understood, however the application of the policy to permitted or recently permitted sites seems a reasonable, balanced approach, because there is a possibility that allocated sites for mineral working might not be taken up, or not be granted planning consent, and there may be a greater chance of this occurring with Areas of Search than Preferred Areas. The Council is not aware of other Mineral Planning Authorities applying similar policies to allocations as opposed to sites with permission. For example, Cornwall Council, in their Minerals Safeguarding DPD, para 72, Table 1, apply their largest 500m buffer zone to "existing mineral sites with planning permission".
Support/Other Comments:	**North Somerset Council Officer Response:**
The Local Plan is Legally Compliant, Sound and has met the Duty to Cooperate with regard to the minerals related policies in the Plan, namely policies SP12, LP16, LP17, LP18, DP30 and DP31. **(Tarmac Trading Limited)**	Comment noted.

Suggested modifications:
The reach of Policy DP30 should be extended to relate to identified Preferred Areas or Preferred Areas of Search. **(Breedon Group)**



DP31: Mineral working

Policy DP31 Mineral working exploration, extraction and processing	
Number of representations received: 2	
Number of objections based on policy being unsound: 1	
Not positively prepared: 1 Not justified: 0 Not effective: 0 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
The policy refers to the requirement for applicants for planning permission for the winning and working of minerals to demonstrate a need for the development proposed. This requirement does not reflect the overall tenor of guidance or to be positive planning and should be deleted. Nowhere within NPPF does guidance point to applicants needing to justify the need for developments for winning and working of mineral. Paragraph 226 of NPPF suggests that minerals planning authorities should plan for a steady and adequate supply of minerals by the consideration of a number of material considerations, including the LAA (a) and landbank considerations (e). These are the metrics that should be material when determining an application, not need as stated. **(Breedon Group)**	The policy just states that regard will be had to consideration of the need for the development, which is appropriate, as that will entail consideration of the landbank for crushed rock in North Somerset. Planning Practice Guidance on Minerals, para 084, refers to the need issue in including: " *There is no maximum landbank level and each application for minerals extraction must be considered on its own merits regardless of the length of the landbank. However, where a landbank is below the minimum level this may be seen as a strong indicator of urgent need."* The policy's justification adds more relevant information on the need criterion. It includes: "*The council will have regard to factors such as the landbank for crushed rock, land allocations and the deliverability of existing permitted reserves, in considering the need issue for planning applications. The Local Plan includes some allocated areas for mineral working, notably to facilitate extensions to existing quarries; (see Policy LP16 and Policy LP17). The council will monitor the landbank annually and aim to maintain a ten-year landbank, as indicated in Policy SP12."*

Support/Other Comments:	**North Somerset Council Officer Response:**
The Local Plan is Legally Compliant, Sound and has met the Duty to Cooperate with regard to the minerals related policies in the Plan, namely policies SP12, LP16, LP17, LP18, DP30 and DP31. **(Tarmac Trading Limited)**	Noted.
Suggested modifications:	
The first bullet point of the policy should be deleted and replaced with the following: "Consideration of the development in the context the need to provide for the steady and adequate supply of minerals (see Policy SP12), the LAA and the landbank" The phrase "...supported by adequate evidence that the development is needed and justified..." should be deleted. **(Breedon Group)**	

DP32: Waste management facilities

Policy DP32 Waste management facilities	
Number of representations received: 1	
Number of objections based on policy being unsound: 0	
Not positively prepared: 0 Not justified: 0 Not effective: 0 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
None	
Support/Other Comments:	**North Somerset Council Officer Response:**
Under this policy, the carrying of waste to/from Weston-super-Mare by rail is favoured. Supportive of growth in rail freight but note that investment would be required in suitable loading/unloading facilities there. The Network Rail freight team can assist with discussing what would be possible. **(Network Rail)**	Noted.
Suggested modifications:	
None	

Development Policies: Historic and Natural Environment

DP34: Green infrastructure

Policy DP34 Green Infrastructure	
Number of representations received: 14	
Number of objections based on policy being unsound: 8	
Not positively prepared: 6 Not justified: 8 Not effective: 9 Not consistent with national policy: 8	
Number of objections based on policy being not legally compliant: 4	
Number of objections based on policy being not compliant with Duty to Co-operate 4	
Main Issues Raised:	**North Somerset Council Officer Response:**
DP34 requires the creation, protection and enhancement of green infrastructure networks; safeguarding ecological corridors; delivering multifunctional open space; and protecting landscape character. However, the three Congresbury housing allocations (183 dwellings) are located in highly sensitive environments and the Plan provides no evidence or strategy to ensure green infrastructure is protected or enhanced. **(Adrian Mealing)**	Policy DP34 sets out requirements which all relevant planning applications should meet, which would include those for the local plan site allocations, such as at Congresbury. It is appropriate for development in Local Plans to be delivered by granting and implementation of planning permissions. It would not be appropriate for evidence relating to DP34 to include a level of detail similar to that used to support planning applications. Para 32 of the NPPF states that evidence underpinning policies should be proportionate.
Objection that GI requirements will be higher for large-scale proposals of 10 dwellings or more, particularly where there is a lack of green infrastructure. Insufficient justification for the implication that development should make up for the lack of existing green infrastructure in the area. Suggest rewording to ensure that the proposed provision accommodates the needs of the development itself. **(Bellway Homes Ltd, Gleeson Land)**	The policy is not intended to require large scale development to make up for existing GI deficiencies in the area, such as in playing fields, for example. In line with Policy DP63, infrastructure should be provided in step with new development. Given the health, recreation, biodiversity and other benefits of GI, it is appropriate for development proposals to look to maximise scope and opportunities for its provision, including multi-functional GI in whatever forms may be suitable. This scope will generally tend to be greater with larger developments. For example, where a development site adjoins a river or watercourse there may well be benefits

	in retaining a GI buffer of open space alongside it, to maximise benefits for recreation, wildlife and visual amenity. The justification to DP34 refers to potential opportunities for improving GI within the strategic GI network identified in the NS Green Infrastructure Strategy (GIS), and to contribute to nature recovery in line with the Local Nature Recovery Strategy (LNRS). There may well be scope for development in appropriate locations to do this, and this is more likely to be the case with larger scale developments.
Policy is too general and the wording is not strong enough which and as such are unlikely to secure required outcomes. The plans delivery mechanisms are weak. There is insufficient focus on monitoring and actions/penalties if developers do not meet planning conditions or section 106 agreements, make contributions, or go bust/sell land on. Policy requires more focus on delivery and actions, including that developers prove they are applying the management required to hit biodiversity targets. **(Guy Stone, Cleeve Parish Council)**	The policy uses the words "must" and "will". It adequately sets out requirements which relevant planning applications should meet. Planning approvals, including conditions and S106 agreements, are likely to specify what detailed provision for GI is needed in each case, and the council can use its enforcement powers to take action to ensure compliance. The policy indicates that where off site GI provision is to be made, formal agreements and financial contributions will be needed. Again, this will be determined at the planning application stage.
Welcome the policy's reference to connections between Green Infrastructure within development and green infrastructure corridors, key green infrastructure assets, and the Local Nature Recovery Strategy. However, Nature Parks should be included in this list. An ambitious Green Infrastructure policy should require new Green Infrastructure to not just reflect these assets but connect to and enhance them. **(Natural England)**	Agreed, addition of reference to Nature Parks is appropriate to recognise their strategic role as part of North Somerset's Green Infrastructure network and will be put forward as a proposed change on Submission of the Local Plan.
This policy should more explicitly require the installation of solar panels on the roofs of new development. This will reduce the need for ground-based panels which have a greater negative impact. **(Tony Harden)**	Provision of solar energy, including use of roof tops, is more appropriately covered in Policy DP6: Net zero construction and DP7: Renewable and low carbon energy.
Concern that the Plan is ineffective because it is unclear how all the different environmental policies work together, making them ineffective. **(Home Builders Federation)**	The Plan is meant to be read as a whole. Relevant policies will each be considered in development management decision making.
The selection of the proposed Tower Farm development in	Policy DP34 sets out the requirements which will help to make



Portishead is in direct contravention of the aims of this policy. It will have a significant negative impact on the Environmental resilience of the area and Weston Big Wood - a SSSI. **(The Downs)**	development proposals better environmentally, including provision of green infrastructure, incorporation of wildlife features. The principle of this particular allocation is addressed under Schedule 1 comments and responses.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support this policy as an important contribution to the health of the population. **(Wrington Parish Council)**	Comment noted.

Suggested modifications:

The Plan must:
-Produce a Congresbury Green Infrastructure Masterplan, identifying: habitat networks, bat flightlines and dark corridors, woodland and hedgerow protection, landscape character zones, open space requirements, tree planting, buffers to heritage assets including Cadbury Hill Fort.
-Map and secure strategic green infrastructure corridors, particularly those serving the Bats SAC.
- Provide GI requirements for each allocation, including: habitat enhancement, accessible natural greenspace, on-site open space, ecological buffers around watercourses and rhynes.
-Add all Congresbury GI projects to the Infrastructure Delivery Plan, with: costings, phasing, delivery partners, funding sources.
- Carry out a cumulative GI impact assessment of the three Congresbury allocations.
(A Mealing)

The policy should be reworded to make it more explicit that large scale developments shouldn't need to make additional provision for existing shortfalls in Green Infrastructure but rather ensure that the proposed provision accommodates the needs of the development itself.
(Bellway Homes Ltd and Gleeson Land)

More focus should be placed on developers proving they are applying the management required to hit biodiversity targets. This needs to be followed up by North Somerset Council, with consequences if targets are not met.
(G Stone)

The policy should more explicitly require installation of solar panels on roofs of new development.
(Tony Harden)



Nature Parks should be included in this list of Green Infrastructure in the policy. An ambitious Green Infrastructure policy should require new Green Infrastructure to not just reflect these assets but connect to and enhance them.
(Natural England)



DP35: Nature conservation

Policy DP35 Nature conservation	
Number of representations received: 22	
Number of objections based on policy being unsound: 15	
Not positively prepared: 8 Not justified: 9 Not effective: 13 Not consistent with national policy: 27	
Number of objections based on policy being not legally compliant: 3	
Number of objections based on policy being not compliant with Duty to Co-operate 5	
Main Issues Raised:	**North Somerset Council Officer Response:**
DP35 is inconsistent with national policy and unlawful as it relies on future planning applications to fix fundamental problems, contrary to Habitats Regulations and NPPF requirements. All three Congresbury allocations (183 dwellings) lie within areas of international ecological sensitivity, and the Plan provides no credible mitigation strategy or evidence base to support these allocations under this policy. **(Adrian Mealing)**	Policy DP35 sets out requirements which all relevant planning applications should meet. It would not be appropriate for evidence relating to DP35 to include a level of detail similar to that used to support planning applications. Para 32 of the NPPF states that evidence underpinning policies should be proportionate. The Local Plan is supported by a HRA at an appropriate level of detail for a local plan.
The policy states Nature Parks will be identified but the policies map does not identify land for them. The mitigation strategy is not deliverable as there is no evidence of designated or functioning strategic mitigation sites within North Somerset. It cannot be concluded there would be no adverse effect on the integrity of the North Somerset and Mendip Bats SAC. The policy should provide full details of where the Nature Parks would be delivered, and how secured, delivered and maintained in perpetuity. **(Backwell PC; Nailsea TC; Flax Bourton PC; Brockley PC; Backwell RA; Nailsea Action Group; Lichfield's; Stokes Morgan Planning Ltd)**	Policies SP11, DP35 and the strategic policies for Wolvershill (LP1), Woodspring (LP2) and Nailsea and Backwell (LP3) all set out the requirement for Nature Parks and how they should be delivered. The Council's Nature Parks webpage contains useful information on Nature Parks and their delivery.

The LPA should consult Natural England where there may be impacts to designated Habitats Sites and ensure the Plan's adoption is linked with the Environmental Delivery Plan (EDP) under the Planning and Infrastructure Bill. During Plan adoption you should prioritise objectives and requirements of the current River Basin Management Plan (RBMP) Cycle 3. Water Framework Directive (WFD) obligations should also be addressed through spatial planning. (**Environment Agency)**	It is within Natural England's remit to create Environmental Delivery Plans and use them and the new Nature Restoration Fund to capture developer contributions to fund strategic interventions that provide greater benefit for nature. There are numerous examples in the emerging Local Plan of references to water resources and the need to safeguard water quality.
Concern regarding the declining numbers from the Brockley Stables Greater Horseshoe (GH) Bat population and the further impact housing development in Backwell will have on this. **(G Dixie)**	The HRA sets out mitigation requirements for proposals affecting SAC bats including the requirement for Nature Parks and these have been incorporated into the policies in the plan.
Policy is not sound as it is not consistent with government policy. Portishead Down (Tower Farm) is a diverse habitat and significant ecosystem, with 2 SSSIs nearby. The site should be protected from all future development to protect the SSSIs and removed as a housing allocation. **(Julia Gregory)**	There are no SSSIs in the vicinity of the Tower Farm housing allocation. There is a local wildlife site near the site. Policy DP35 also covers such local sites and indicates that development will not normally be permitted which would result in the loss in extent or otherwise have a significant adverse effect on them, unless the harm can be mitigated by appropriate measures. Schedule 1 of the Plan indicates that, for Tower Farm, a suitable ecological buffer is to be provided to Weston Big Wood, a local wildlife site, and future management and maintenance of this area is to be secured.
There may be a failure to comply with European protected species provisions of the Conservation of Habitats and Species Regulations 2017 in respect of otters and beavers. Otters frequent the Land Yeo around Nailsea and water courses near Backwell Lake. Beavers are allegedly found upstream on the Land Yeo. **(J Blatchford)**	Policy DP35 covers protected species like otters and beavers. It states: *"Development which could harm, directly or indirectly, species which are legally protected, or species and habitats that have been identified as species or habitats of principal importance in England (also known as section 41 or 'priority' species and habitats) will not be permitted unless the harm can be avoided or mitigated by appropriate measures".*
There is insufficient site-specific mitigation, monitoring, or evidence that biodiversity impacts will be avoided, minimised, or compensated. The Plan does not demonstrate that development at Pill Green or Pill Road will adequately protect habitats and protected species. Both sites are near the North Somerset & Mendip Bats	Policy DP35, along with other policies in the plan, set out requirements which planning applications should meet regarding BNG and mitigations for environmental and ecological impacts. Schedule 1 sets out specific requirements for each site, such as buffer zones.



SAC, the Severn Estuary SSSI, and key wildlife corridors. Pill Green has ancient and veteran trees and lies within sensitive ecological zones. **(Kevin Payne)**	It would not be appropriate for evidence for DP35 to include a level of detail similar to that used to support planning applications. Para 32 of the NPPF states that evidence underpinning policies should be proportionate. The Local Plan is supported by a HRA at an appropriate level of detail for a local plan.
Object to policy requiring developers to produce their own 'shadow' Habitats Regulations Assessment (HRA) reports for the council to assess. This is inconsistent with the legal framework and NPPF, as responsibility for screening and undertaking an HRA lies with the competent authority (the decision maker) under the Habitats Regs. **(Stokes Morgan Planning Ltd)**	In practice many developers choose to submit the required information in a comprehensive form so produce full reports. This is still in line with the regulations; the Council assesses the information and comes to its own conclusions. These reports have come to be known as shadow HRA reports. The note in the justification to DP35 that "developers will be expected to produce their own 'shadow' HRA reports for the council to assess" is acknowledging and supporting this practice.
If worst-case mitigation is incorporated into a scheme in any event (like lighting assessments, HEP calculations, and dark corridors on boundary), it should not be necessary to require a full season of Horseshoe bat surveys, saving much time and money for small schemes. **(Stokes Morgan Planning Ltd)**	North Somerset and Mendip Bats Special Area of Conservation (SAC) Supplementary Planning Document (April 2026) sets out the requirement with respect Horseshoe bat surveys. Policy DP35 of the emerging Local Plan requires an up-to-date ecological survey assessment where development proposals may impact legally protected species such as bats.
Policy appears overly prescriptive and duplicates other policies. It should provide further flexibility so there may be circumstances where alternate or compensatory wildlife features are permissible, and public rights of way can be diverted or stopped up where compensatory provision is available. The policy should be amended to only request on site green infrastructure provision or enhancement where justified by evidence. **(Marcus Plaw Persimmon Homes)**	The policy seeks compensatory provision where the loss of habitats or features of importance to wild flora and fauna is unavoidable, taking account of the need for adequate biodiversity net gain. This is reasonable and in line with national guidance. Stopping or diverting public rights of way is not a relevant issue for this policy on nature conservation. Green infrastructure provision is to be encouraged generally in new development for various reasons, including health. NPPF para 96(c) promotes good health and preventing ill-health "for example through the provision of safe and accessible green infrastructure" etc.
The requirement to demonstrate Building with Nature principles should be removed or be voluntary. It is a non-statutory tool going beyond mitigation of ecological impacts; it seeks BNG but that is already in national legislation. (**Savills on behalf of clients including Taylor Wimpey, Crest**	The policy requires demonstration that the 'principles' set out in Building with Nature are addressed and does not require a full assessment and accreditation. This is considered to be reasonable and proportionate.



Nicholson, Barratt Redrow, and Vistry Group, Marcus Plaw Persimmon Homes)	
Green infrastructure provision for biodiversity, through Section 106 agreements or planning conditions needs to be monitored and policed.Needs of biodiversity should not be forced into specific areas (due to development wrongly being the focus). 'Nature Parks' surrounded by vast residential developments are unlikely to work. **(Guy Stone)**	Monitoring of compliance with conditions and obligations is undertaken by the Council's Enforcement team. The Council's Nature Parks webpage contains useful information on Nature Parks, indicating that "Locations for Nature Parks should be based on habitat suitability and connectivity. This has been modelled for North Somerset Council through extensive research including tracking bat movements (please see Geckoella's paper for more information)".
Regarding the Plan's HRA, a survey bespoke to North Somerset would inform where mitigation measures would be best targeted to parts of the Severn Estuary site in North Somerset. The HRA should note the updated Bats SAC SPD which extends the Bat Consultation Zones. The required Recreation Management Strategy (RMS) for the Severn Estuary site should be clearly set out in policy. Visitor surveys will need to be specifically targeted to highly sensitive areas for SPA species, as well as areas of Functionally Linked Land. Locally focussed management strategies may be most appropriate. Regarding recreational pressure on Avon Gorge Woodlands SAC, wording recommended by the HRA should be incorporated in Policy LP2. Strongly recommend the HRA's text for a policy for "down the line" investigation of air quality issues as part of the masterplanning of land use allocations, both for North Somerset and in combination with neighbouring authorities. **(Natural England)**	The Council has prepared a Statement of Common Ground with Natural England which addresses the issues raised. The Council has commissioned consultants to undertake visitor surveys to help inform preparation of a Recreation Management Strategy for the Severn Estuary SAC/SPA/Ramsar in North Somerset.
The sentence not permitting development which would have an adverse impact on identified sites of international should be removed	Agreed. It is proposed to amend the policy's sentence about development having an adverse effect on internationally important sites by addition of

or amended. It is contrary to the HRA process, which include an Appropriate Assessment (exploring mitigation) and Derogation (possible exemption.) The sentence not normally permitting development likely to have a direct or indirect adverse effect on SSSIs' biodiversity or geological interest will not normally be permitted' needs amending or removal. It differs from NPPF para 193 bullet point b), as it omits an exception. **(Savills on behalf of clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group)**	reference to derogation. The part of the policy on SSSIs and NNRs includes the word "normally". The Justification adequately explains that the council will normally only exceptionally permit development adversely affecting a SSSI or NNR where it is satisfactorily demonstrated that the benefits of the development clearly outweigh both its likely impact on the features of the site contributing to its value and any broader impacts on the network of SSSIs and nationally important sites.
Support the policy's references to swift bricks and swift nesting features, but they are not consistent with national policy because they don't include NPPG Natural Environment paragraph 017's more detailed content. **(Mike Priaulx)**	The support is noted. However, it is not necessary to repeat the detail in the Planning Practice Guidance in Local Plan policies.
The current proposals ignore cumulative effects of development in key areas, and significant net loss of Green Belt. Connectivity of ecological networks should at least be maintained and improved. The Plan is a significant threat to essential connections between international, national, and locally designated sites, wildlife corridors and connecting stepping stones. It also affects the council's duty on ecological networks under the Natural Environment and Rural Communities Act 2006. Some proposals undermine principles of the North Somerset Local Nature Recovery Strategy (LNRS). **(Ms Poole)**	Policy DP35 refers to improving the quality and connectivity of habitats. Some proposals specifically include measures which will aid such connectivity, such as the proposed Nature Parks, notably at strategic development locations. Policy DP35, along with other policies in the plan, set out requirements which planning applications should meet regarding BNG and mitigations for environmental and ecological impacts. Schedule 1 also sets out specific requirements for each site. The LNRS is referred to in policies like DP34 on Green infrastructure, and DP36 on BNG. For instance DP36 includes "*The provision of BNG should support delivery of recommended measures for habitat creation and enhancement identified in the Local Nature Recovery Strategy (LNRS) for West of England, and associated mapping/toolkit."* The Local Plan is supported by a HRA which considers potential impacts on Habitats sites of international importance for wildlife, and any need for mitigation.



Support/Other Comments:	**North Somerset Council Officer Response:**
Welcome the ambitions of DP35 and commitment to protect sites of international importance. The LPA should consult Natural England where there may be impacts to designated sites. **(Environment Agency)**	Comment noted.
We appreciate efforts of a wider range of contributors to Nature Conservation locally, and recognition this Policy gives to this. **(Wrington PC)**	Comment noted.

Suggested modifications:

The binary test of the first sentence 'Development which would have an adverse impact on identified sites of international importance (which include SACs SPAs and Ramsar sites) will not be permitted' should be removed or amended.

The wording 'Development within or in proximity to a Site of Special Scientific Interest (SSSI) or National Nature Reserve that is likely to have a direct or indirect adverse effect on its biodiversity or geological interest will not normally be permitted' needs amending or removal.

The DP35 requirement that applications demonstrate principles set out in Building with Nature should be removed.
(Savills on behalf of clients including Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group.)

The policy should be amended to only request that green infrastructure provision or enhancement be made on site where justified by evidence.

The policy should be amended to add flexibility to the use of 'Building with Nature', a voluntary framework.
(Marcus Plaw Persimmon Homes)

The Policy should be amended to provide full details of where Nature Parks would be delivered, with reference to the Policies Map, and how secured, delivered and maintained in perpetuity.
(Backwell PC; Nailsea TC; Flax Bourton PC; Brockley PC; Backwell RA; Nailsea Action Group)

Avon Gorge Woodlands SAC: Strongly recommend you incorporate the HRA's para 6.93 recommended text for a policy to set a framework for "down the line" investigation of air quality issues as part of masterplanning of land use allocations, both for North Somerset and in combination with neighbouring authorities.



HRA para 4.26: The HRA should note the updated Bats SAC SPD (consultation which extends the Bat Consultation Zones based on most recent evidence.)

Recommend the Recreation Management Strategy requirement for the Severn Estuary SPA/Ramsar site be clearly set out in policy.

Regarding recreational pressure on Avon Gorge Woodlands SAC, wording recommended by the HRA should be incorporated in Policy LP2, (similar wording for the Woodspring allocation to that in the Bristol Local Plan).
(Natural England)



DP36: Biodiversity net gain

Policy DP36 Biodiversity Net Gain	
Number of representations received: 18	
Number of objections based on policy being unsound: 13	
Not positively prepared:6 Not justified: 10 Not effective: 12 Not consistent with national policy: 9	
Number of objections based on policy being not legally compliant: 2	
Number of objections based on policy being not compliant with Duty to Co-operate 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Policy DP36 is unsound. The three Congresbury allocations (183 dwellings) provide no evidence or mechanism to demonstrate BNG can be achieved locally, particularly given the highly constrained ecological landscape. A justified BNG policy must be backed by ecological evidence demonstrating 10% net gain is achievable, but the Plan fails to provide this. **(Adrian Mealing)**	Policy DP36 sets out BNG requirements which all relevant planning applications should meet, which would include those for the local plan site allocations, such as at Congresbury. It is appropriate for development in Local Plans to be delivered by granting and implementation of planning permissions. It would not be appropriate for evidence relating to DP36 to include a level of detail similar to that used to support planning applications. Para 32 of the NPPF states that evidence underpinning policies should be proportionate. The Council's Biodiversity SPD includes more detailed guidance on BNG, and there is also relevant Planning Practice Guidance (PPG) on it: Biodiversity net gain - GOV.UK. These include details on how BNG is secured and enforced.
This policy is not required, as a minimum Biodiversity Net Gain is now a statutorily mandated requirement by the Environment Act 2021. **(Bellway Homes Ltd)**	Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) merely introduced the 10% BNG requirement. Policy DP36 adds more information, consistent with para 187(d) of the NPPF. Para 006 of PPG on BNG indicates that planning authorities and



	neighbourhood planning bodies when preparing new policies in line with the NPPF will want to take account of the statutory framework for biodiversity net gain.
The Plan does not ensure new development will be properly supported by essential infrastructure. Its delivery mechanisms are weak and do not provide confidence. Policies relying on voluntary interpretation or "expectations" and discretionary language like "will be expected" are unlikely to secure required outcomes, particularly for affordable housing, design quality, BNG, etc. **(Cleeve Parish Council)**	Policy DB36 uses stronger wording than "should have regard to". It states: "*Where biodiversity net gain (BNG) is required, proposals must demonstrate at least a 10% net gain accounted for in a biodiversity gain plan".* It includes *"In all cases, proposals must demonstrate how BNG will be implemented and monitored".*
Support the policy's compliance with current legal requirements regarding a minimum of 10% BNG on or off-site. However, the policy should be tailpieced to account for any subsequent changes in legislation. (**Diverse Partnerships Yatton Ltd)**	It is not necessary for the policy to be tailpieced to account for any subsequent changes in legislation. The Plan must be written in line with legislation and regulations as relevant at the time of writing.
The policy requires at least a 10% net gain. It is not sound and against PPG on BNG, paragraph 006, to seek a higher percentage than the statutory 10% BNG, unless justified and evidenced, demonstrating the implications, which could impact deliverability of housing and social/community facilities. Higher requirements require evidence that this will not impact viability. HBF are unaware of such evidence in North Somerset. (**Gladman Developments; Home Builders Federation)**	Policy DP36 requires "at least a 10% net gain", so proposals providing 10% are likely to be acceptable. However, where developers are willing to provide more and can justify that, it would not be appropriate for the policy to restrict them. Planning Practice Guidance on Biodiversity net gain refers to a biodiversity gain objective of "at least a 10% increase in biodiversity value" in para 001. The justification's reference to a biodiversity gain plan points to the need for justification and evidence.
The plan should differentiate more clearly between the mitigation hierarchy, regarding protected habitats, and the BNG hierarchy which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits. The plan should refer to statutory credits and also the small sites metric. Costs of BNG must be fully accounted in the whole plan viability assessment as a single specific item, not combined into a generic s106 costs item. Figures used for BNG costs should be kept under review as BNG implementation progresses and greater	The Plan's Viability Assessment takes account of BNG and assumes 10% net gain in all the modelling undertaken. The justification to DP36 already refers to the need to keep mitigation for protected species and habitats separate from BNG. It states "*Any existing requirements regarding protected species and designated sites should be prioritised in planning and designing measures to mitigate for proposed development. Development proposals must ensure that delivery of a net gain for biodiversity is additional to such other obligations, and not just delivering something that would occur anyway".*

understanding of actual costs is gained. This policy and supporting text should say more about Local Nature Recovery Strategies. (**Home Builders Federation)**	There is updated national Planning Practice Guidance on BNG gain which gives more information, including details on credits and the Biodiversity Gain Hierarchy, and its distinction from the mitigation hierarchy. It will be appropriate to amend the justification to DP36 to refer to this updated guidance, "Biodiversity net gain" (and delete the existing sentence, which refers to the previous guidance, and reads "*There is also government guidance on BNG called "Understanding biodiversity net gain"*.) Reference to the small sites metric is already included in the justification, which also already refers adequately to the Local Nature Recovery Strategy (LNRS) for West of England.
Support/Other Comments:	**North Somerset Council Officer Response:**
Our client supports the policy's consistency with the 10% legal requirements and agrees it would be inappropriate to seek an alternative figure, although many developments will exceed it anyway. **(Diverse Partnerships Yatton Ltd)**	Noted
Support for genuine, well-researched methods of creating biodiversity net gain. Advocate making measures like swift boxes, protected eave sites, bat and hedgehog access holes mandatory for development, with flexibility to increase the type and number of requirements as further research demonstrates benefits for other threatened species. **(Cleeve Parish Council)**	The plan includes policies and/or their justifications which require or promote use of measures such as bat boxes, swift bricks and hedgehog corridors. For example, policies SP11 Historic and natural environment and DP35 Nature conservation



Suggested modifications:

The policy should be tailpieced to account for any subsequent changes in legislation to ensure alignment with legal requirements as they may change over time.
(Diverse Partnerships Yatton Ltd)

We would like to see measures such as swift boxes, protected eave sites, bat access holes and hedgehog access holes made mandatory as part of development requirements, with flexibility to increase the type and number of requirements as further research demonstrates benefits for other species under threat.
(Cleeve Parish Council)

Various modifications suggested:

- It will be important to differentiate between the mitigation hierarchy, which seeks to avoid harm and then mitigate it in relation to protected habitats and the BNG hierarchy which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits. The Plan should also reference statutory credits.
- The Plan should also refer to the small sites metric.
- The Plan should do all it can to explain how the Biodiversity Gain Hierarchy and mitigation hierarchy work in different ways and that they seek to achieve different aims
- The policy and supporting text should say more about Local Nature Recovery Strategies

(Home Builders Federation)



DP37: Trees, woodlands and hedges

Policy DP37 Trees, Woodlands and Hedges	
Number of representations received: 12	
Number of objections based on policy being unsound: 10	
Not positively prepared: 6 Not justified: 7 Not effective: 9 Not consistent with national policy: 5	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate 4	
Main Issues Raised:	**North Somerset Council Officer Response:**
Objection to lack of detailed evidence regarding trees and hedgerows in Congresbury such as tree and hedgerow mapping for allocations in Congresbury, Congresbury tree planting strategy, hedgerow assessment or strategy or hedgerow retention strategy. **(Adrain Mealing)**	Policy DP37 sets out requirements which all relevant planning applications should meet, which would include those for the local plan site allocations, such as at Congresbury. It is appropriate for development in Local Plans to be delivered by granting and implementation of planning permissions. It would not be appropriate for evidence relating to DP37 to include a level of detail similar to that used to support planning applications. Para 32 of the NPPF states that evidence underpinning policies should be proportionate.
Policy DP37 is an unnecessary expansion to Policy DP35: Nature conservation with duplicate requirements in relation to the natural environment policies within the draft Local Plan. **(Various Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group, Bellway Homes Ltd, Gleeson Land)**	Policy DP37 has more specific content on trees and woodland than Policy DP35. Policy DP35 covers nature conservation more widely and it is appropriate to have a separate policy specifically covering trees and woodland. There is not much duplication between policies, with only limited reference to trees and woodland in Policy DP35 on Nature conservation.
Objection to the following policy wording as it is unclear: *"In exceptional circumstances where loss is unavoidable and fully justified, a suitable compensation strategy for replacement of trees, hedgerows, or to rectify damage (direct or indirect) to woodland is*	It is appropriate to expect development proposals to retain existing trees (not just veteran trees) where possible, consistent with NPPF para 136. Therefore, it is appropriate to regard tree loss as something which should occur in exceptional circumstances, where it is unavoidable and fully



identified". **(Bellway Homes Ltd)**	justified, as the policy states, and where suitable replacement will occur.
Objection to the wording: *'Proposals for off-site provision is made where tree planting is not appropriate or practical on site'* It is felt that this lacks specificity so is not appropriate for decision making. If retained, it should be clarified in what circumstances tree planting will be 'not appropriate or practical on site'. **(Various Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group) (Bellway Homes Ltd)**	It is not appropriate for the policy to try and envisage every eventuality where it may not be appropriate or practical for tree planting on site. As such it is reasonable for that assessment to be made by the decision-maker at planning application stage.
Tree pit design should not be forced through policy but simply proposed in planning applications. Tree management should also be outside of the application process. (**Marcus Plaw Persimmon Homes)**	The policy only requires use of high-quality tree pit designs. It does not stipulate a certain type be used. It is appropriate that the developer considers what tree pit design to incorporate in planning applications. It is appropriate that the policy refers to the need/requirement for management of trees and wooded areas, and that this be left to the developer to decide how this will be achieved, whether through planning applications or management agreements relating to the development.
Concerned how this policy links into BNG delivery; requiring trees in gardens impacts on the BNG Metric which recognises that management, maintenance and retention of any trees in gardens would fall to householders once properties are sold and occupied. (**House Builders Federation)**	There is no major difficulty with trees in gardens and BNG. Garden trees with a trunk diameter of 30cm or more (measured 150cm from the ground) should be counted in baseline assessments for BNG. This is to ensure that the biodiversity value of significant trees in gardens is properly accounted for in the BNG calculation and to encourage their retention. Source: Trees and biodiversity net gain on small sites – Forestry Commission.
Objections to the policy requiring development to provide one tree per dwelling. It is excessive, onerous and not deliverable or realistic or deliverable particularly on brownfield sites/apartments so is contrary to, and goes beyond, the NPPF. Any requirement would need to be fully evidenced incorporated into the viability study. The council should therefore ensure any such policy approach introduces more flexibility or is deleted. **(Marcus Plaw Persimmon Homes**, **McCarthy Stone & Churchill Living, Various: Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group**, **Bellway Homes Ltd)**	One tree planted per dwelling is appropriate and likely to be practical for dwellings with their own gardens and in many cases for flats where trees can be planted in community gardens. This approach is not unreasonable, considering the value of trees regarding visual amenity, climate change and biodiversity, etc. NPPF para 136 refers to the important contribution which trees make to the character and quality of urban environments, and the fact that they can "help mitigate and adapt to climate change".

The policy should be more concise and focused on the key aspects of successful tree / hedge / woodland provision. This should include referencing other national guidance or policy as necessary, with more detail placed in supporting text or other supplementary documents. **(Bloor Homes South West)**	It is felt that the policy contains the appropriate amount of detail for effective implementation. Further guidance maybe produced to support this policy.
Tree planting should be set away from watercourses, to ensure that access is retained to watercourses for maintenance vehicles and emergencies. **(Environment Agency)**	Noted. This point can be included in future updated local guidance on trees.
There is no reference to the importance of the Western Forest in developing a network of linked woodlands. This section could appropriately mention the Bats SAC SPD, which requires development of new hedge systems containing native species trees. **(Cleeve Parish Council)**	Noted. The Western Forest is something which can be more appropriately included in the intended local guidance on trees. The Bats SPD (North Somerset and Mendip Bats SAC Guidance on Development Supplementary Planning Document) is more related to biodiversity, and reference here would be inappropriately specialised. Reference is made elsewhere in the Local Plan, such as the Justification to Policy DP35 on Nature conservation.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
It is considered that the sentence '*Proposals for off-site provision is made where tree planting is not appropriate or practical on site'* lacks specificity and should be removed, but if it is retained, it should be made clear in what circumstances tree planting will be considered to be 'not appropriate or practical on site'. **(Various Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group, Bellway Homes Ltd**) Combine Policy DP37 with Policy DP35 and delete Policy DP37. **(Gleeson Land)**	



Include reference to the supplementary planning document on the Bat SAC.
(Cleeve Parish Council)

The Policy should be amended so that planting of a minimum of one tree per garden is deleted. Tree pit design should not be forced through policy but simply proposed as part of a planning application. Tree management should also be outside of the application process.
(Marcus Plaw Persimmon Homes)

This policy should be reviewed to be more concise and focused on the key aspects of successful tree / hedge / woodland provision. This should include referencing other national guidance or policy as necessary, with then more detail placed in supporting text or other supplementary documents.
(Bloor Homes South West)

Requiring 1 new tree per new dwelling on site especially for small brownfield sites delivering apartments is not deliverable or realistic. The council should reconsider this element and ensure any such policy approach introduces more flexibility or is deleted.
(McCarthy Stone & Churchill Living)



DP38: Landscape

Policy DP38 Landscape	
Number of representations received: 5	
Number of objections based on policy being unsound: 5	
Not positively prepared: 5 Not justified: Not effective: 2 Not consistent with national policy: 5	
Number of objections based on policy being not legally compliant: 4	
Number of objections based on policy being not compliant with Duty to Co-operate 3	
Main Issues Raised:	**North Somerset Council Officer Response:**
The policy should present clear guidance to applicants requesting that development respects the character of historic landscape, as opposed to stating it will also "respond through masterplanning to the historic landscape etc". This is a key omission and should be addressed. The policy should be amended to include reference to respecting the character of historic landscapes. **(Marcus Plaw Persimmon Homes)**	The policy states that development should "respect the character of the historic landscape" in the 7th bullet.
The thrust and direction of this policy is supported, but it needs to be more positively worded to ensure it is positively prepared and consistent with national policy, by explicitly recognising that development will inevitably result in some change and impact on the landscape and its character (in the wider sense). The policy should emphasise that proposals should integrate with the natural, built, and historic environment, and where impacts occur, they should be offset through proportionate and deliverable mitigation, agreed via planning conditions or obligations. The sentiments of the justification should come through more clearly in the main policy text. **(Mac Mic Strategic Land (Land north of Banwell Road)**	The policy is already positively worded. It does not prevent development, but seeks, for example, to protect the character, sense of place, distinctiveness and diversity of the district's landscape and townscape. The policy and justification are appropriate as worded.



This is a perhaps unnecessary policy with most points covered by other policies within the Plan. It should be combined with others and the policy deleted. **(Gleeson Land).**	There is greater clarity in having a separate policy on landscape, rather than combining it with others into a long complex policy covering many environmental issues.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
The Policy should be amended to include reference to respecting the character of historic landscapes. **(Marcus Plaw, Persimmon Homes)** The policy should be revised to ensure it is positively prepared and consistent with national policy by explicitly recognising that development will inevitably result in some landscape change. It should focus on achieving high-quality outcomes through collaboration between the Council and applicants, securing mitigation and enhancement measures that contribute to local character and sense of place. It should emphasise that proposals should integrate with the natural, built, and historic environment, and where impacts occur, they should be offset through proportionate and deliverable mitigation, agreed via planning conditions or obligations. **(Mac Mic Strategic Land (Land north of Banwell Road))** The policy content should be combined with others and the policy deleted. **(Gleeson Land)**	



DP39: Mendip Hills National Landscape

Policy DP39 Mendip Hills National Landscape	
Number of representations received: 3	
Number of objections based on policy being unsound: 3	
Not positively prepared: 1 Not justified: 1 Not effective: 2 Not consistent with national policy: 2	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that the policy is not consistent with national policy because Policy DP39 does not adequately reflect the LPA's role in satisfying the statutory duty to 'seek to further' the purposes of the conservation and enhancement of the natural beauty of the Mendip Hills National Landscape. Also, it does not make clear, pursuant to NPPF paras 58, 189 and 190(c) in particular (and relevant parts of the PPG), that s106 planning obligations and/or CIL monies may be necessary to address off-site recreational pressures within the Mendip Hills National Landscape, resulting from new development within or near the designated area. **(Ian Bowen, Mendip Hills National Landscape)**	The policy does not need to repeat NPPF and as such there is no need to refer to 'great weight'. There is no need for the suggested addition to the policy requiring developer contributions to mitigate harm to the existing recreational network as a result of increased pressures associated with new development. Other policies cover this such as SP11, DP15 and DP63. The suggested reference to DP63 in the justification is acceptable. The suggested additional detail for the policy requiring developers to explain why any development would fail to conserve and enhance the natural beauty of the area is inappropriate. They should aim to conserve and enhance it. The website of the Mendip Hills National Landscape organisation still refers to 12 Special Qualities so it is not considered necessary to change this.
Support for principle of the policy but a much greater level of detail is required either within the policy or the supporting text to set out what is considered to be in the public interest and also how major development is determined. Also, clarification is required regarding proposed development outside the National Landscape but located within its setting which will therefore have	Major development is defined in the Local Plan glossary as "For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of one hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015".



an impact on its landscape, setting, tranquillity and scenic beauty. Currently, the policy applies the same test to developments within and those outside but would have an impact on its setting. It should be clarified that the same test should not apply to development sites outside the National Landscape. The NPPF paragraph 190, only considers development in the National Landscape. Policy DP39 should be more in alignment with NPPF Paragraph 189, which states: '… development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.' **Mac Mic Strategic Land (Land north of Banwell Road)**	Public interest will be defined on a case-by-case basis. It would not be possible to provide a definition which covers every potential proposal. The third paragraph of policy DP39, read as whole, reflects para 189 and 190 of the NPPF and therefore it is not felt any change is required. The second paragraph and third paragraphs of the policies differentiate between sites within the National Landscape and development outside but within the setting of the National Landscape.
The draft Policy fails to allow for allocations for development in the Plan including at our site at Wolvershill (north of Banwell) where there will be views of the AONB. Draft Policy LP1 recognises this and states "The development must respect the landscape setting, including minimising any adverse impact on the Mendip Hills National Landscape through sensitive design." **Wain Estates (Wolvershill)**	There is no need for the suggested changes. The plan is intended to be read as a whole, and all relevant policies will be considered in assessing proposals.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	



Suggested modifications:

All ~~D~~development proposals affecting the Mendip Hills National Landscape must conserve and enhance its landscape and scenic beauty and enhance its wildlife and cultural heritage, to which great weigh will be attached. ~~taking into account the economic and social well-being of the area~~.

Development which would have an adverse impact on the landscape, setting, tranquility and scenic beauty of the Mendip Hills National Landscape, including views into and out of the National Landscape, will not be permitted unless in exceptional circumstances and where it can be demonstrated that it is in the public interest. In seeking to further the purpose of conserving and enhancing the natural beauty of the area, the Local Planning Authority will require all applications for development to clearly demonstrate through suitable Landscape and Visual Impact Assessment and other relevant assessments how the proposal would conserve and enhance the natural beauty of the area with reference to its Special Qualities as set out in the most up-to date Mendip Hills National Landscape Management Plan. Where any development would fail to conserve and enhance the natural beauty of the area, applicants must explain the reasons why, and identify and incorporate all reasonable mitigation measures before the Local Planning Authority will consider any countervailing benefits in the overall planning balance. Such measures may include:

Scheme amendments including to the proposed overall scale, size of buildings, layout, appearance/materials and landscaping; and

Appropriate compensatory measures secured through planning conditions or obligations. ~~Development affecting this National Landscape should conserve and enhance its Special Qualities. All development will be controlled, through the use of planning conditions, to ensure it would minimise any detrimental effect to the natural beauty of the National Landscape.~~

Outdoor lighting schemes, including those associated with new development, will not be permitted in the National Landscape or within its setting unless it has been demonstrated through evidence prepared by a suitably qualified lighting professional, that there will be no adverse impact from obtrusive light and cumulative skyglow.

Any ~~planning~~ development being considered within the National Landscape should also have regard for the public rights of way network. In appropriate cases, developer contributions will be required to mitigate harm to the existing recreational network as a result of increased pressures associated with new development.

The Mendip Hills National Landscape organisation has published ~~12~~ 13 Special Qualities within its Management Plan 2025 – 2030 which create the Mendip Hills sense of place and identity and combined give rise to the area's designation as a National Landscape. The Special Qualities



include the 'Sparsely populated and tranquil plateau' and 'Views towards and Views out' of the Mendip Hills. The ~~12~~ 13 Special Qualities can be viewed on the Mendip Hills National Landscape webpages. In promoting any development within the National Landscape or its setting, applicants will be expected to assess all likely effects with reference to the Special Qualities. Through measures including Landscape and Visual Impact Assessments (to Landscape Institute/IEMA GLVIA3 or successor standards), ecology and lighting assessments, applicants should identify all reasonable measures to conserve and enhance the area and mitigate any harm.

In addition, off-site developer contributions may be sought, in line with Policy DP63, to address recreational pressures on nature, key routes and destinations within the designated area arising from new development.

(Ian Bowen, Mendip Hills National Landscape)

The text of the policy should be more in line with NPPF Paragraph 189.

The supporting text should reflect NPPF Paragraph 190 and provide more clarity on what development is in the public interest, whilst also making it clear who determines major development.

Policies should be positively worded to encourage enhancement and integration with local character.

(Mac Mic Strategic Land (Land north of Banwell Road)

Policy DP39 should be amended to be consistent with draft Policy LP1, as follows:

"Development proposals on sites that are not allocated by Policies LP1 and LP2 of the Plan that affect ~~affecting~~ the Mendip Hills National Landscape must conserve and enhance its landscape and scenic beauty and enhance its wildlife and cultural heritage, taking into account the economic and social well-being of the area.

Development proposals on land that is allocated by Policies LP1 and LP2 must respect the landscape setting, including minimising any adverse impact on the Mendip Hills National Landscape through sensitive design.

(Wain Estates (Wolvershill))



DP40: Built heritage

Policy DP40 Built heritage	
Number of representations received: 1	
Number of objections based on policy being unsound: 1	
Not positively prepared: 0 Not justified: 0 Not effective: 0 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
The policy includes a threshold of “no harm” or “preserve” – a binary starting point where no harm is acceptable. This is unduly prescriptive. The NPPF, seeks to balance harm against public benefits, even in circumstances where substantial harm will occur. It states that ‘when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)’ (paragraph 212). The Framework offers a clear and well-established methodology for assessing harm and balancing public benefits, ensuring decisions are justified and transparent. Aligning Policy DP40 with this approach will support effective, consistent decision-making and safeguard heritage assets without imposing unrealistic requirements and remedy the current unsoundness. **(Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group)**	The policy is consistent with the NPPF. The policy includes: **“**If there is any perceived harm to any heritage asset this harm will need to be fully justified and weighed against any public benefits of the overall development scheme within the final planning balance”.

Support/Other Comments:	North Somerset Council Officer Response:
None	
Suggested modifications:	
The policy should be modified to align with the NPPF approach which offers a clear and well-established methodology for assessing harm and balancing public benefits, ensuring decisions are justified and transparent. **(Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group)**	



DP41: Archaeology

Policy DP41 Archaeology	
Number of representations received: 1	
Number of objections based on policy being unsound: 1	
Not positively prepared: 0 Not justified: 1 Not effective: 1 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
As drafted the approach lacks clarity and is not therefore effective or sound. Given the potentially substantial costs of archaeological evaluation, this should be of an appropriate extent and form which reflects particular circumstances of each site, and the likelihood of there being below ground archaeology. We advocate change to a proportionate, pre-app stage stepped / cascade approach in the policy, with: 1. A desk-based assessment for all sites; 2. When deemed appropriate and necessary from stage 1, a geophysical survey to see if there are any below ground structures or disturbances requiring further investigation. 3. If stage 2 does reveal ground anomalies warranting further excavation then a targeted (as opposed to percentage site-wide) archaeological investigation, to investigate these further. Subsequent archaeological evaluation post-determination, as a condition of the permission, may identify further areas of interest, but it's unlikely this would require preservation in situ, so could be excavated and recorded, and not impact on delivering the planning permission.	There is no need for the policy to require the 3 stepped approach suggested. It already refers to an archaeological desk-based assessment and/or field evaluation to establish the extent and significance of the remains and the potential harm of the proposals to that significance before the planning application is determined. This is consistent with NPPF para 207. Then the policy refers to either a need for preservation, or if the council decides, appropriate excavation and recording of remains before development, which may be attached as conditions if planning permission is granted. The policy's 3rd paragraph's is appropriate. The first sentence states that proposals will be expected to demonstrate how any change proposed to archaeological remains would preserve and, where appropriate, enhance impact upon their significance. The second sentence addresses the scenario where presumably this is not satisfactorily demonstrated and there would be perceived harm to a heritage asset, in which case this harm will need to be fully justified and weighed against any public benefits

The policy's third paragraph is internally inconsistent. The first sentence requires that an asset is 'preserved'; the second explains the response if harm is expected to occur. These cannot coexist, as an asset is either preserved or harmed. To resolve this requires a wording change to "enhance impact upon their significance". **(Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group)**	of the overall development scheme within the final planning balance.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
Introduce a stepped approach. Amend the third paragraph of the policy to include "enhance impact upon their significance". **(Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group.)**	



DP42: Historic Parks and Gardens

Policy DP42 Historic Parks and Gardens	
Number of representations received: 1	
Number of objections based on policy being unsound: 1	
Not positively prepared: 0 Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Objection to use of the word 'preserve' in relation to heritage assets with Policy DP42 which respondents are saying should be modified to bring its tests into line with those of the NPPF. Strongly object to the policy's approach of requiring development proposals to demonstrate no harm through detailed heritage assessments. There is no expectation or requirement in national policy that development would result in 'no harm' to historic parks and gardens or their setting. As designated heritage assets, they fall under the balanced, judgement-based approach in NPPF paragraphs 212-215. Paragraph 214 outlines that if a development will lead to substantial harm to a designated heritage asset, *'local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss' or all of the criteria outlined apply'*. Paragraph 215 adds *'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the*	The NPPF glossary indicates that registered parks and gardens are designated heritage assets. Para 202 of the NPPF indicates that heritage assets are "an irreplaceable resource and should be conserved in a manner appropriate to their significance". Para 212 states: "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)." Para 213 indicates that substantial harm to or loss of grade II registered parks or gardens, should be "exceptional", and of grade I and II* registered parks and gardens should be "wholly exceptional". Para 214 indicates that development leading to substantial harm of a designated heritage asset should be refused unless specified requirements are met, one being that it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh that harm or loss.



public benefits of the proposal including, where appropriate, securing its optimum viable use'. **(Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group).**	In view of NPPF paras 202, 212, 213 and 214 the wording of policy DP42 is considered acceptable.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
Policy DP42 must be modified to bring its tests into line with the NPPF. **(Taylor Wimpey, Crest Nicholson, Barratt Redrow, and Vistry Group)**	



Development Policies: Life Prospects

DP43: Affordable housing (including rural exception sites)

Policy DP43: Affordable housing and rural exception schemes	
Number of representations received: 30	
Number of objections based on policy being unsound: 23	
Not positively prepared: 13 Not justified: 19 Not effective: 21 Not consistent with national policy: 14	
Number of objections based on policy being not legally compliant: 3	
Number of objections based on policy being not compliant with Duty to Co-operate 6	
Main Issues Raised:	**North Somerset Council Officer Response:**
As drafted the policy risks undermining housing delivery due to viability issues, the wording should allow a degree of flexibility to assess viability on a case-by-case basis. The viability evidence does not conclude that all typologies are viable at the percentages set out in the plan and there is limited certainty that the levels of affordable housing identified are deliverable when coupled with particular infrastructure costs on some sites. Particular comments around 50% on Green Belt sites and 30% at Wolvershill strategic location. **(Diverse Partnerships Yatton Ltd, Bloor Homes, Home Builders Federation, Mac Mic Strategic Land, Homes England, Bellway Homes Ltd, Stephanie Fowler, Strongvox Ltd, Barratt Bristol, Ainscough Strategic Land, Taylor Wimpey, Parker Strategic Land, Nailsea Holdings LVA LLP, Rubix Strategic Limited)**	DP43 allows case by case considerations, with the inclusion of the following wording: *Developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7, and other Green Belt sites, 30% on greenfield sites and 20% on previously developed land, all at nil public subsidy. If these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored.* The viability evidence supports this approach, explaining: *there may be opportunities to secure enhanced affordable housing delivery which would be missed if the target percentage(s) were set too low. For example, there may be circumstances including sites or locations supporting increased viability and which may secure permission later in the plan period, or localised opportunities even within areas otherwise indicated as having lower viability more typically. Therefore the Council*

	should not rule out higher proportions of affordable housing being secured in individual cases. If a higher policy percentage is set than broadly indicated through the results of this and previous viability work, then our recommendation would be for that to continue to include an acknowledgment of the role of viability and potential flexible approach within policy.
A specific policy should be introduced for 100% affordable schemes which includes allocations. **(Latimer Developments Limited)**	This is not considered necessary as there is nothing to preclude sites allocated through Policy LP5 and identified in schedule 1 coming forward for 100% affordable housing.
The policy should include a numerical target. **(Latimer Developments Limited)**	This is considered too prescriptive, given the varying percentages on different site sizes identified.
Concerns regarding viability assumptions for sheltered and extra care housing as the viability can be more finely balanced for these schemes than for general needs housing. **(McCarthy Stone & Churchill Living)**	This is not considered necessary given the provision of flexibility in the policy, which states: *If these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored.*
No regard has been given to social housing or shared ownership. **(Chris Hopcraft)**	The policy makes provision for both social rent and shared ownership tenures.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support the reduction from 38.5% on greenfield sites in the last iteration of the plan to 30%. **(Gladman Developments, Wain Estates, Vistry Group)**	Noted.
Support the tenure split of 75% social rent / 25% shared ownership as being based upon evidence but some suggestions that the policy should be worded to allow this level of flexibility across the plan period and fixed figures should not be included within the policy itself. **(Gladman Developments, Catesby Estates, Persimmon Homes, Gleeson Land, Nailsea Holdings LVA LLP)**	Support welcomed. The tenure split indicated in the policy is intended as a guide, based upon the Local Housing Needs Assessment that informed the plan, and flexibility is already in place, as set out in the justification: *The current affordable housing tenure split of 75% social rented and 25% shared ownership reflects the need for affordable rented housing and the obligation to provide the nationally prescribed level of intermediate housing, with shared ownership being the best option in North Somerset to meet this requirement. As the demand for intermediate housing is sensitive to changes in market and development conditions, there may be a need to review the tenure split over the plan period if circumstances*

	change.
Welcome that the policy references viability tests where policy compliance may not be achievable. **(Persimmon Homes)**	Comments noted.
Support the policy approach allowing applicants to be able to use Local Housing Needs Assessment, data from the housing needs register and local housing needs surveys to justify the precise size and type of affordable housing to be provided on individual sites as this is a broad and appropriate range of data sources. **(Wain Estates)**	Support welcome.
There is no reference to flood risk sequential test in this policy. **(Environment Agency)**	There is no need for this matter to be explicitly referred to in the affordable housing policy on the basis other policies in the plan address flood risk and these will continue to apply.
The Council should make reference to the types of affordable provision such as first homes, affordable rent and other forms of equity share - and reflect those options in the text of the plan, or cross refer to Annex 2 of the NPPF. **(Persimmon Homes, South West Housing Association Planning Consortium)**	The glossary of the plan includes a definition of affordable housing, which is taken from the National Planning Policy Framework. It is not considered necessary to refer to particular products as these are subject to change.
General support for the policy approach, thresholds and percentages, as well as the flexibility for discussions on individual sites. **(South West Housing Association Planning Consortium)**	Support welcomed.
Query over the trigger point and whether how it is phrased (10 dwellings or more (or on sites of 0.5 hectare or above), and five dwellings or more within the Mendip Hills National Landscape) accords with NPPF paragraph 65. The policy should simply just refer to the requirement being applied to 'major developments'. **(Bellway Homes Ltd)**	There is no conflict between the policy threshold and the NPPF. In any event, given the recent government consultations, it is not considered appropriate to use the definition of major developments in national policy as this is subject to change.
Support for the percentage figures within each development category, however use of the phrase 'will be expected' weakens the likelihood these will be achieved as developers will press for exceptions.	Support welcomed. The policy wording is considered appropriate as there will be cases that are exceptions.



(Cleeve Parish Council)	
Suggested modifications:	
The Council should make reference to the types of affordable provision such as first homes, affordable rent and other forms of equity share - and reflect those options in the text of the plan. **(Persimmon Homes)** The policy should be modified to seek a level of affordable housing which is viable. **(Mac Mic Strategic Land, Bellway Homes Ltd, Stephanie Fowler, Strongvox Ltd, Barratt Bristol, Ainscough Strategic Land, Taylor Wimpey)** Some suggestions that the policy should be worded to allow this level of flexibility across the plan period and fixed tenure split figures should not be included within the policy itself. **(Gladman Developments, Catesby Estates, Gleeson Land)** The policy should simply just refer to the affordable housing policy applying to 'major developments'. **(Bellway Homes Ltd)** A specific policy should be introduced for 100% affordable schemes which includes allocations. **(Latimer Developments Limited)** The policy should include a numerical target. **(Latimer Developments Limited)** The plan should be amended to refer to 45% affordable housing on sites released from the Green Belt. **(Nailsea Holdings LVA LLP)** Suggest the text be amended to add flexibility, by adding 'unless evidence is available to suggest an alternative tenure split would be appropriate in a specific location'. **(Nailsea Holdings LVA LLP)** Policy DP43 should be amended as follows: "Developments will be expected to provide 50% affordable housing on land released from the Green Belt as set out in Policy SP7, and other	

Green Belt sites (subject to viability as per paragraph 67 of the NPPF), 30% on greenfield sites and 20% on previously developed land, all at nil public subsidy. If these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored."
(Rubix Strategic Limited)

Propose that replacing the word 'expected' with 'required' would make it clear to developers that the percentages set out in the policy are mandatory.
(Cleeve Parish Council)



DP44: Gypsies and Travellers and Travelling Showpeople and Schedule 8

Policy DP44: Gypsies, Travellers and Travelling Showpeople and Schedule 8: Gypsy and Traveller Sites	
Number of representations received: 7	
Number of objections based on policy being unsound: 5	
Not positively prepared: 2 Not justified: 4 Not effective: 3 Not consistent with national policy: 2	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concerns regarding the two proposed allocations at Land to the north of Moorland Park and south of the A370, and Land to the west of Heathfield Park, south of A370 due to the sites being located in Flood Zone 3a. Sequential approach should be followed when allocating new sites. Extensions to existing sites within Flood Zone 3 need to be mindful of suitability of increasing flood risk with climate change. **(Environment Agency)**	The exceptionally high level of need for new pitches coupled with the very limited options for meeting that need mean that expansion of existing sites (where the majority of the need is coming from) despite being in flood zone 3a is the most deliverable option to ensure that the needs of the Gypsy and Traveller community in North Somerset are met. Need will also be met through identifying sites as part of the strategic development at Wolvershill (north of Banwell) and Woodspring (south west of Bristol) in their early phases of development outside of areas at risk of flooding.
Objection from the Wolvershill Consortium to the requirements for a minimum of 18 Gypsy and Traveller pitches as part of the Wolvershill Strategic Development. Objection relates to the lack of evidence and justification to the pitches being in this location. The consortium assert that the Council should undertake (and evidence) a thorough review of available Council owned assets that may be available to meet the need for additional pitches and plots, and review and evidence why sites available as part of the Council's brownfield register are not also available and suitable. The consortium also raises concerns with the delivery of pitches in terms of funding and implementation.	The GTAA (2025) identifies a high level of need for Gypsy and Traveller pitches over the plan period. As such there is an expectation that the large strategic allocations will contribute towards meeting this need as part of the wider housing type and mix. Council owned assets have been reviewed internally, and no suitable sites are available. The council will work with developers, housing associations, the Gypsy and Traveller community and explore all additional funding sources to ensure effective delivery of these sites.



(Bellway Homes, Bloor Homes South West, Aiscough Strategic Land and Wain Estates)	
Objection to the requirement of a minimum of 18 Gypsy and Traveller pitches at the Woodspring Strategic allocation as more suitable sites were submitted through the Call for Sites process and these should be considered instead. **(Taylor Wimpey)**	The GTAA (2025) identifies a high level of need for Gypsy and Traveller pitches over the plan period. As such there is an expectation that the large strategic allocations will contribute towards meeting this need as part of the wider housing type and mix. One of the sites submitted through the Call for Sites process has been identified as an allocation for 40 Gypsy and Traveller pitches. The other six sites were not suitable or deliverable.
Support/Other Comments:	**North Somerset Council Officer Response:**
The GTAA identifies a need for 80 pitches over the first five years of the plan. The plan identifies a supply of deliverable sites sufficient to provide 80 pitches to meet this locally identified need, as such no request has been made of B&NES Council to respond to any unmet need. **(Bath and North East Somerset Council)**	Noted and agreed.
Suggested modifications:	
To delete the third paragraph of policy DP44 to remove reference to the provision of gypsy and traveller sites at Wolvershill and Woodspring. **(Bellway Homes, Bloor Homes South West, Aiscough Strategic Land and Wain Estates, Taylor Wimpey)**	

DP45: Residential space standards

Policy DP45: Residential Space Standards	
Number of representations received: 7	
Number of objections based on policy being unsound: 7	
Not positively prepared: 4 Not justified: 6 Not effective: 6 Not consistent with national policy: 6	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Objection to the requirement for new residential developments to meet the National Described Space Standards (NDSS) with issues being raised around: Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. Viability - the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Implementation – a transitional period was needed if the NDSS were to become an adopted policy requirement to enable developers to factor the cost into land acquisitions. **(Bellway Homes, Home Builders Federation, Waine Estates)**	The adopted development plan already requires all new build market and affordable housing to meet the Nationally Described Space Standards. This has been in force since 2016 and has not affected deliverability of homes. Developers should be well aware of this requirement which, as well as being an adopted policy for the last 10 years, has also been an emerging policy in the new Local Plan. This cost should therefore have been factored into land acquisitions. The requirement for new residential development to meet Nationally Described Space Standards has been tested through the whole plan viability assessment and does not raise issues around viability.
Concern that the requirement for NDSS would impact on affordability of dwellings.	All households should have the right to a decent standard of accommodation regardless of income.



(Home Builders Federation)	
Objection to wording in the justification which requires "*all rooms that have the capacity to serve as a bedroom should comply with the standard*" as this is not a requirement set out in the NDSS and would fundamentally impact how residential developments are designed. It could lead to greater land take, delivery of less units and is not in accordance with DP8: Efficient use of land. **(Diverse Partnerships Ltd, Yatton, Stephanie Fowler, Strongvox Ltd, Taylor Wimpey (Youngwood Lane - Nailsea)**	This requirement in the justification seeks to address a loophole whereby developers propose a three-bedroom house and an office (which doesn't meet the NDSS) and then market the home as a four-bedroom house. Any room which could serve as a bedroom should meet the NDSS for that purpose. This requirement has been moved to the justification to aid implementation of the policy rather than forming part of the policy as it had done in previous versions of the plan. This is to address concerns raised through previous consultations and allow for flexibility.
Policy should facilitate more flexibility to ensure that proposals can deliver innovative design and respond to market conditions e.g. higher demand for home office space since the Covid 19 pandemic resulting in more people working from home. **(Diverse Partnerships Ltd, Yatton, Stephanie Fowler, Strongvox Ltd, Taylor Wimpey - Youngwood Lane, Nailsea)**	The policy as worded provides flexibility around conversions as it is recognised that meeting the NDSS may not be feasibility in some cases particularly with historic buildings. Equally ensuring a room could be used as an office or a bedroom because it meets the NDSS (see above comments) increases the flexibility of how homes are used allowing households to adapt to changing circumstances.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
That the Nationally Described Space Standards are not a mandatory requirement in the policy. **(Bellway Homes, Home Builders Federation, Waine Estates)** That the wording in the justification requiring "*all rooms that have the capacity to serve as a bedroom should comply with the standard*" to be removed. **(Diverse Partnerships Ltd, Yatton, Stephanie Fowler, Strongvox Ltd, Taylor Wimpey (Youngwood Lane - Nailsea)**	

DP46: Housing type and mix

Policy DP46: Housing type and mix	
Number of representations received: 27	
Number of objections based on policy being unsound: 21	
Not positively prepared: 7 Not justified: 13 Not effective: 15 Not consistent with national policy: 12	
Number of objections based on policy being not legally compliant: 4	
Number of objections based on policy being not compliant with Duty to Co-operate: 6	
Main Issues Raised:	**North Somerset Council Officer Response:**
Threshold for housing mix to apply on sites of 10 or more dwellings is too low – suggest amending to 100 dwellings as set out in the Preferred Option Plan (Reg 18). **(Wain Estates, Taylor Wimpey, Crest Nicholson, Barratt, Redrow, Vistry Group)**	The threshold ensures that the policy applies to all large sizes and as such ensures an appropriate mix of homes across the district.
Clarification sought as to whether the requirements should be applied to developments allocated in the plan, including the site allocation at Wolvershill (north of Banwell) under draft Policy LP1. Indeed, aspects (such as self-build and older persons housing) are not included in the policy wording of Draft Policy LP1. This should be clarified and if included, justified by the evidence base. **(Bellway Homes, Wain Estates)**	The plan should be read as a whole and any development would need to be in accordance with all the policies within the plan. As such there is no need to repeat this policy requirement in the policies for Strategic Development Locations such as LP1: Wolvershill.
The policy's reliance on a specific Housing Needs Assessment—a document often updated after the Local Plan is adopted—could restrict proposals coming forward later in the plan period. It is essential that developments delivered in the later stages can respond to market conditions and the evolving needs of the local community. The policy must provide sufficient flexibility to ensure it remains applicable to all sites and schemes.	The policy as written provides enough flexibility to respond to future market conditions.



(Diverse Partnerships Yatton Ltd, Mac Mic Strategic Land, Stephanie Fowler, Strongvox, Taylor Wimpey (Youngwood Lane, Nailsea))	
The policy is too vague and doesn't specify the quantum of each type of home that is required to satisfy the requirements. **(Barretts Bristol)**	It is felt that the policy is written in a way which ensures the delivery of appropriate housing types throughout the plan period, whilst being flexible enough to respond to changing circumstances or specific issues which may arise on a site-by-site basis.
Further clarification required on expectations with regards to older persons accommodation and self / custom build and what the term 'where appropriate' means in practice (i.e. does this include where viable). **(Homes England)**	The plan should be read as a whole and other policies such as DP43: Affordable housing and DP47: Older persons accommodation provide further detail regarding this issue.
The Council should ensure that the Local Plan will result in a wide range of older persons housing and self and custom build housing opportunities. In order to provide homes for older people, the Council should allocate sites for older persons housing. **(Wain Estates)**	Policy DP47: Older persons accommodation seeks to ensure that there is a sufficient supply and range of housing and accommodation suitable to meet the needs of older people. The strategic allocations at Woodspring and Wolvershill also require Extra Care Accommodation for older people.
Concern over the lack of requirement for the development of low-rise new build flats. This is a missed opportunity and undermines the ability to retain young people in the local economy. **(Cleeve Parish Council)**	Low rise flats are one form of house type that may be suitable on certain sites specifically where higher densities maybe appropriate. However, this may not be suitable on all sites and therefore should not be a specific requirement.
The requirement to limit certain housing sizes where there is perceived over-provision could constrain the ability to respond to actual demand and market signals. **(Mac Mic Strategic Land – land north of Banwell Road, Mac Mic Strategic Land – Flax Bourton, Mac Mic Strategic Land - Backwell)**	Within certain areas of North Somerset there is an oversupply of larger housing and an under supply of smaller housing for first time buyers or downsizers. In areas where this is the case this policy aims to address this imbalance.
Viability	
Development viability should be considered on a case-by-case basis when considering housing mix and the policy should make reference to this. Concern over the impact of M4(2) and M4(3) requirement on viability and concerns over the self-build requirement on viability. **(Barretts Bristol, Mac Mic Strategic Land, Vistry Group)**	The whole plan viability assessment has tested the policy requirements set out in this policy and has found them to be viable.



Self and custom Build	
Objection to the inclusion for the provision for self-build and custom build plots as there is no justification or evidence for the requirement. If all of the allocations in the Local Plan were to provide these types of plots there would be a significant oversupply. It would be better to make specific allocations for self-build and custom build plots rather than requiring all sites to include an unknown proportion. **(Barretts Bristol, Diverse Partnerships Yatton Ltd, Rubix Strategic Limited, Stephanie Fowler, Taylor Wimpey (Youngwood Lane, Nailsea)**	The policy takes a pragmatic approach to the delivery of self and custom build housing requiring an appropriate proportion based on the local need identified on the council's self-build register.
The policy should specify a maximum proportion of self-build and custom-build plots that will be sought linked to genuine demand on the register, rather than leaving interpretation open-ended. Clear guidance is needed to avoid uncertainty and ensure practical delivery within larger housing development. **(Taylor Wimpey, Crest Nicholson, Barratt, Redrow, Vistry Group)**	It is not considered appropriate to set a maximum threshold as this may artificially constraint delivery of self-build plots on sites where they are desired, suitable and achievable.
Concern over delivery of self-build or custom build housing on sites with a high level of affordable housing e.g. sites removed from the green belt that are required to provide 50% affordable housing or sites which are 100% affordable. Provision of a proportion of self-build and custom build plots will further harm the viability of these sites, making their delivery more difficult. **(Bellway Homes, Rubix Strategic Limited, Latimer Developments Limited)**	The viability assessment has taken this into account, clearly setting out that the provision of serviced plots for self or custom build development has the potential to be sufficiently profitable so as not to provide a significant drag on the viability of schemes in general. Coupled with flexibility provisions in Policy DP43, this is considered to be a robust approach.
"Self-build and custom-built plots" requirement should relate to the self-build register in the locality of the site specifically, as well those with a genuine interest in self-build as part of a larger housing development, rather than the register for the district as a whole. inclusion of the above in the supporting text would strengthen the effectiveness of the policy. **(Bellway Homes, Vistry Group)**	Housing needs are considered on a district wide basis, and there is no reason for the approach to self and custom build provision to differ. The questions asked on the register around locational preferences are not mandatory, and therefore it is appropriate to seek to deliver opportunities across the whole area. The amount of plots required on any given site is not prescriptive, and therefore data from the self-build register may be used to inform the level of provision on a case by case basis.



Accessible and adaptable housing	
Objection for the requirement for 100% of dwellings to be built to M4(2) standard as the need for this requirement isn't justified as the LHNA states "Based on the evidence, it would be appropriate for at least 45% of homes on new developments to comply with Requirement M4(2) Accessible and Adaptable Dwellings". Accessible and adaptable housing requirements should be determined through updates to the building regulations and these will ultimately supersede local policies. There is also a possibility that it could be delivered through the introduction of National Development Management policies. There is no need to pre-empt changes to the building regulations or the introduction of non-statutory National Development Management policies and enshrine/duplicate the requirement in local policy. **(Bellway Homes, Catesby, Diverse Partnerships Yatton Ltd, Gladman, Home Builders Federation, Homes England, Various: Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group)**	Due to North Somerset's aging population, as identified in the LHNA, and the need to future proof housing so new homes are flexible, accessible, adaptable and age friendly supporting the changing needs of individuals and families at different stages of life, requiring all dwellings to be built to M4(2) standards is appropriate. This requirement has been tested through the viability assessment and does not impact on the overall viability of the plan.
Clarification is sought with regards to the evidence for the intended split of M4(3) in terms of M4(3)a (wheelchair adaptable) and M4(3)b (wheelchair accessible). This percentage should be justified with appropriate evidence and viability work. M4(3)b relates to wheelchair accessible housing which can only be required on affordable housing where the Council has nomination rights in accordance with the PPG. Any such requirements would also need to be fully considered from a viability perspective. **(Bellway Homes, Gladman, Home Builders Federation, Homes England)**	The split between M4(3)a (wheelchair adaptable) and M4(3)b (wheelchair accessible) on any given site is not prescriptive, and the split will be decided on a case by case basis. The justification to the policy states: *Where development is subject to optional requirement M4(3) and includes the provision of affordable homes the agreed proportion of such homes must be designed to be 'wheelchair accessible'. Where applied this must be secured through an appropriate planning condition that states which homes are 'wheelchair accessible'*
M4(3) is not viable in older persons housing/retirement living apartments - the policy to allow flexibility of the requirement subject to viability. **(McCarthy Stone and Churchill living)**	The Local Plan's viability assessment has assessed this requirement, and it does not affect the overall viability of the plan.
The quantum required covering a 5% requirement of M4(3) across both market and affordable homes is unreasonable and excessive –	It is justified and in accordance with national guidance to provide M4(3) across market and affordable homes to meet the differing requirements



restricting the overall availability of homes. It would be more appropriate for the market homes to be required to meet the M4(2) standards only and capable of being subsequently adapted. The concern in providing 5%, homes could end up being unsold should there not be demand in a specific location. **(Persimmon Homes)**	of residents. This provides flexibility and choice ensuring that residents who are not eligible for affordable housing still have the opportunity to purchase a wheelchair adaptable home if required.
The policy needs to consider potential exceptional circumstances which can justify appropriately reduced requirements for M4(2) and M4(3) due to flooding and topographical constraints in accordance with the PPG. **(Bellway Homes, Home Builders Federation, Homes England, Various Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group)**	The justification to the policy states: "*Where for reasons of topography or other specific factors a site or individual plot is not suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable, alternative reasonable provision to ensure the dwelling achieves an appropriate level of accessibility will be sought*". This allows for cases where sites specific circumstances may mean that the full requirement cannot be met. It would not be feasible or desirable for the policy or justification to list all potential exceptional circumstance.
There should be a requirement for much more wheelchair accessible housing. Adaptable housing is expensive to convert into fully accessible. North Somerset has an aging population and the amount of M4(3) housing proposed in the plan will not meet the need of existing and future disabled or elderly people. **(Paul Borthwick)**	The requirement for M4(3) housing reflects the Local Housing Needs Assessment but also the Viability Assessment which indicates that 5% is the level which is achievable in terms of whole plan viability.
The policy should give preference that new housing near or within the centre of such villages (such as Wrington) with at grade footways to the local facilities should all be built to M4(3) standard to encourage more sustainable living in such communities for elderly people and thus release of larger properties back into the market for others **(Tony Harden)**	Comments noted. The requirement for M4(3) housing reflects the Local Housing Needs Assessment but also the Viability Assessment which indicates that 5% is the level which is achievable in terms of whole plan viability. A requirement for accommodation for older people in sustainable locations is also set out in Policy DP47: Older persons accommodation.
Support/Other Comments:	**North Somerset Council Officer Response:**
The SWHAPC is pleased that the supporting text on page 220 highlights the important role that self and custom build housing can have in the housing market. It would be positive to see affordable housing mentioned within this self and custom build supporting text and advise that the Council refers to the Self-Build and Custom	Comment noted.



Housebuilding Planning Practice Guidance when formulating new policy. **(South West Housing Association Planning Consortium)**	
Support for the requirement for all housing to meet the M4(2) standard but recommend increasing the proposed build rate for M4(3) on sites of 10 or more units from 5% to 10%. The evidence indicates that around 6% of households include at least one wheelchair user. Raising the requirement to 10% will mean that residents can access suitable housing when needed. There is concern that developers often negotiate reductions in these requirements on viability grounds. **(Habinteg Housing Association, Joe Tristram).**	Comments of support welcome. The requirement for M4(3) housing reflects the Local Housing Needs Assessment but also the Viability Assessment which indicates that 5% is the level which is achievable in terms of whole plan viability.
We note that the policy in relation to accessible and adaptable homes reflects Building Regulations and therefore we support this policy. However, we would note that requiring accessible homes above this policy target could have ramifications for development viability. **(Rubix Strategic Limited)**	Comments noted.
Suggested modifications:	
The mandatory requirement for self-build units within major schemes should be deleted. **(Diverse Partnerships Yatton Ltd, Taylor Wimpey (Youngwood Lane, Nailsea), Strongvox, Stephanie Fowler)** The requirement for all new homes to be M4(2) compliant should be deleted/reduced. **(Bellway Homes, Catesby, Diverse Partnerships Yatton Ltd, Gladman, Home Builders Federation, Homes England, Various: Taylor Wimpey Crest Nicholson Barratt Redrow Vistry Group)** Policy DP46 should be modified to introduce flexibility and ensure consistency with national policy. It should recognise that housing mix requirements must be informed by site-specific considerations, viability, and market demand **(Mac Mic Strategic Land – land north of Banwell Road, Mac Mic Strategic Land – Flax Bourton, Mac Mic Strategic Land - Backwell)** The threshold should be amended so the policy requirements apply only to sites above 100 dwellings. **(Wain Estates, Taylor Wimpey, Crest Nicholson, Barratt, Redrow, Vistry Group)** Requirement for M4(3) should be higher than 5% **(Habinteg Housing Association, Joe Tristram, Paul Borthwick)**	



DP47: Older persons accommodation

Policy DP47 Older Persons Accommodation	
Number of representations received: 6	
Number of objections based on policy being unsound: 3	
Not positively prepared: Not justified: 1 Not effective: 3 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Development must take a sequential approach to flood zones when allocating different housing types, particularly if this includes ground floor sleeping accommodation and single storey dwellings. Development must consider flood risk with climate change. **(Environment Agency)**	This is acknowledged and set out in DP9: Flood Risk which will apply to any new development. It is therefore not considered necessary to repeat it in every policy.
The economics of providing older persons housing are different from open-market and affordable housing, for example, due to the need to provide communal spaces. It is for this type housing to be considered separately in the whole plan viability appraisal. **(Home Builders Federation)**	The viability assessment has tested specific specialist housing scenarios tested, including general retirement/sheltered, extra care and full care.
Acknowledge that the Council will seek an element of affordable housing provision for older persons as part of appropriate market-led developments for older people, but it is felt this needs to be defined and also subject to viability. Therefore, seek further clarification and justification on the intention to seek affordable housing from C2 use developments, especially care home facilities. **(Homes England)**	It is reasonable to require an element of affordable housing provision on older persons housing schemes and the whole plan viability evidence supports this approach. Policy DP43 will apply in cases where affordable housing is sought. This policy includes provision for site specific viability assessments if it can be demonstrated that the requirements cannot be met on a particular scheme.
Developers of older person's housing schemes should not be	It is acknowledged that older person's housing can bring many benefits to



required to demonstrate need given the significant need identified and the many benefits that such developments bring and bullet point 1 of policy DP47 should be deleted. **(McCarthy Stone and Churchill Living)**	local communities, but it can also bring challenges particularly in terms of care needs as residents get older. It is therefore appropriate that older person's accommodation in North Somerset is to meet the needs of the existing population and that it can be demonstrated that it is meeting this local need.
Recommend that the Council and its consultant reconsider the viability assumptions for sheltered and extra care housing and if sheltered and / or extra care is shown to be not viable or less viable the typology is exempted from affordable housing or an additional typology added to the policy. In particular, the Council should reconsider the assumptions incorporated for typical scheme, assumed unit size, sales periods, empty property costs, marketing costs, profit, external works, sales values and local plan costs. The following text should be deleted: *The council will seek an element of affordable housing provision for older persons as part of appropriate market-led developments for older people*. **(McCarthy Stone and Churchill Living)**	It is reasonable to require an element of affordable housing provision on older persons housing schemes and the whole plan viability evidence supports this approach. Policy DP43 will apply in cases where affordable housing is sought. This policy includes provision for site specific viability assessments if it can be demonstrated that the requirements cannot be met on a particular scheme.
Most of McCarthy Stone's customers move from within a 5-mile radius and free-up local family-sized houses. Residents therefore will not have a significant impact on the Council's resources as people tend to move locally, indeed older persons housing conversely will benefit the Council's budget with reduction with pressure on social care and the NHS. We therefore feel that the requirement to restrict marketing to the district area for a 6-month period is inflexible and should be removed from the plan and the last paragraph removed from the justification. **(McCarthy Stone and Churchill Living)**	It is acknowledged that older person's housing can bring many benefits to local communities, but it can also bring challenges particularly in terms of care needs as residents get older. It is therefore appropriate that older person's accommodation in North Somerset is to meet the needs of the existing population and that it can be demonstrated that it is meeting this local need.
Support/Other Comments:	**North Somerset Council Officer Response:**
Note that comments from previous regulation 18 representations have been taken on board from the council with the introduction of a new individual policy for older population is welcomed.	Comments noted.



(Vistry Group)	
Suggested modifications:	
Suggested amendment to wording to read: "the council will seek an element of affordable housing provision for older persons as part of appropriate market-led developments for older people, subject to viability." **(Homes England)** Suggested deletion of first bullet point which states: "*Demonstrates that it will contribute towards meeting an identified need within the area and is targeted towards the needs of local residents*" **(McCarthy Stone and Churchill Living)** Suggested deletion of the following text: "*The council will seek an element of affordable housing provision for older persons as part of appropriate market-led developments for older people*". **(McCarthy Stone and Churchill Living)** Suggested deletion of the last paragraph from the justification and removal of 6 month marketing period. **(McCarthy Stone and Churchill Living)**	



DP48: Residential Annexes

Policy DP48: Residential Annexes	
Number of representations received: 2	
Number of objections based on policy being unsound: 1	
Not positively prepared: 0 Not justified: 0 Not effective: 0 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
There is no mention of flood risk or climate change. **(Environment Agency)**	Flood risk and climate change are covered by other policies in the plan which relate to all new development proposals. As such there is no need to repeat those issues in every policy.
Objection to the first criterion of the policy which restricts annexes from being standalone buildings – requiring sharing of facilities. This approach is unnecessarily rigid and does not reflect modern family needs or national policy objectives. The inclusion of small, self-contained annexes encourages intergenerational living and decreases dependence on institutional care facilities. **(Kit Stokes)**	It is recognised that residential annexes provide a way of supporting older relatives or other family members who need limited support to live independently but with relatives on hand to provide care as required. Therefore, within settlement boundaries, annexes in the form of new detached buildings within the grounds of an existing dwelling, or a conversion or extension are permitted. However, residential annexes in the countryside could lead to unsustainable development in isolated or rural locations if the annexes are subsequently sold or let as separate residential dwellings. The policy provides the flexibility for the provision of annexes in the countryside whilst safeguarding against unsustainable development.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	



Suggested modifications:
Revise DP48 to allow standalone annexes where they remain ancillary to the main dwelling, subject to size limits, occupancy conditions, and prohibition on separate sale. This pragmatic approach meets housing needs while preventing inappropriate development. **(Kit Stokes)**

DP49: Healthy places

Policy DP49: Healthy Places	
Number of representations received: 6	
Number of objections based on policy being unsound: 3	
Not positively prepared: 1 Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 2	
Main Issues Raised:	**North Somerset Council Officer Response:**
Objection to lowering the threshold for HIAs from 200 dwellings (as currently required) to 50 dwellings or sites of 1ha or more. Concern that 1 hectare sites will only be a small housing development once other requirements such as BNG/SUDs etc are factored in. Schemes of this size are unlikely to have significant impacts on the health and wellbeing of the local population or particular groups within it. **(Bellway Homes, Rubix Strategic Ltd)**	Lowering the threshold requirement for HIAs to 50 dwellings or sites of 1 hectare or more reflects the importance the council puts on embedding healthy places into planning policies. The new threshold requirements strike a balance between being proportionate in terms of requiring HIAs, whilst also broadening the scope of when HIAs are requested to ensure health impacts are considered across more developments and therefore benefitting more communities.
The provisions for health impact assessments should be set out in the plan and not left for consultation with the Council. Those discussions will take time and no doubt come with a charge – this is simply unhelpful and lacks clarity. **(Persimmon Homes)**	Further guidance will be produced by the council regarding levels of HIA and when they will be required. It would not be appropriate to include that level of detail in the Local Plan policy.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support for this policy there is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. Design which facilitates active travel will improve health and well-being by enabling physical activity. **(BNSSG ICB, Sport England)**	Support noted and welcomed.



Support for this policy as it is essential for the long-term health and wellbeing of the population. **(Wrington Parish Council)**	Support noted and welcomed.
Suggested modifications:	
Thresholds should be revisited so they are proportionate. **(Bellway Homes, Rubix Strategic Ltd)**	

DP50: New community facilities, open space and sports pitches.

Policy DP50: New community facilities, open space and sports pitches	
Number of representations received: 3	
Number of objections based on policy being unsound: 1	
Not positively prepared: 1 Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that the housing allocations in Congresbury are inconsistent with Policy DP50 as this requires new development to deliver or enhance community facilities, open spaces and sporting facilities, yet no evidence base or details have been provided about how this will be achieved in the village nor how current facilities can cope with demand. **(Adrian Mealing, Resident)**	An Infrastructure Delivery Plan accompanies the Local Plan and sets out the infrastructure required to support he level of housing proposed in the plan across the district as a whole.
The policy should reflect the fact that technical guidance can change, so feel there is a need to add a caveat to ensure that on-site provision reflects current standards at the time of build/implementation. **(Sport England)**	The relevant standards of on-site provision will be determined at the planning application stage based on further consultation with relevant stakeholders and relevant regulations/guidance. It is not felt this is required in the policy.
Support/Other Comments:	**North Somerset Council Officer Response:**
General support for the policy as it promotes the provision of new community facilities within settlement boundaries. Support the wording which encourages the co-location of complementary community uses and is suitably flexible to encourage maximum	Support welcomed.

utilisation of future community assets. **(BNSSG ICB)**	
Suggested modifications:	
There is a need to add a caveat to ensure that on-site provision reflects current standards at the time of build/implementation. **(Sport England)**	

DP51: Protection of built community facilities

Policy DP51: Protection of built community facilities	
Number of representations received: 2	
Number of objections based on policy being unsound: 0	
Not positively prepared: 0 Not justified: 0 Not effective: 0 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
The length of marketing period referred to should be increased from 6 months to 12 months as this gives consistency with the minimum period in many other plans to help 'guard against unnecessary loss' in line with paragraph 98 of the NPPF (2024). A six-month period also makes it challenging for community groups to form and fundraise to enable them to bid for properties. **(The Theatres Trust)**	Six months is considered an appropriate length of time for the effective marketing of a site/premises and is consistent with other policies in the plan which require sites/premises to be marketed.
Policy DP51 could prevent the NHS from selling sites that are no longer needed or are being replaced through wider estate reorganisation and service transformation programmes. Request for the Local Plan to allow alternative uses on surplus NHS land in these circumstances without requiring the retention of community facility uses on these sites, so that the NHS can reinvest revenue in modern facilities and infrastructure. Additional wording suggested in representation. **(BNSSG ICB)**	The policy as worded provides the flexibility to enable redevelopment of sites provided the relevant criteria are demonstrated. It would not be appropriate for the policy to outline every scenario for every potential community facility. This has subsequently been agreed with the NHS through the Statement of Common Ground.



Support/Other Comments:	**North Somerset Council Officer Response:**
The Theatres Trust are broadly supportive of the policy. **(The Theatres Trust)**	Support Welcomed.
The Bristol, North Somerset, South Gloucestershire Integrated Care Board agree with the approach to allow for existing healthcare uses/facilities to be redeveloped for other uses in instances where it is considered that the "*building is genuinely redundant/surplus to requirements for its uses*", as it enables the NHS to dispose of assets in circumstances where it can be proven that there is no longer a purpose for them. **(BNSSG ICB)**	Comment noted.
Suggested modifications:	
Suggested additional wording: *"Where the site or building is genuinely redundant/surplus to requirements for its uses. A site will be deemed genuinely redundant/surplus if any of the following circumstances apply: insert.... "Where healthcare facilities are declared surplus or identified as part of an estate strategy or service transformation plan where investment is needed towards modern, fit for purpose infrastructure and facilities, there will be no requirement to retain any part of the site in an alternative community use.*" **(BNSSG ICB)** The length of marketing period referred to should be increased from 6 months to 12 months **(The Theatres Trust)**	

DP52: Protection of open space and recreation

Policy DP52: Protection of open space and recreation	
Number of representations received: 4	
Number of objections based on policy being unsound: 4	
Not positively prepared: 2 Not justified: 2 Not effective: 3 Not consistent with national policy: 3	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 1	
Main Issues Raised:	**North Somerset Council Officer Response:**
The policy lacks clarity and risks conflicting with site-specific allocations, such as LP2 for Woodspring, where parts of the allocation include existing open space. To avoid undermining development on sites already assessed and allocated through the plan-making process, it is proposed that DP52 should explicitly apply only to non-allocated sites. A clear exemption should be added, so the policy does not apply to land allocated for development in the Local Plan, suggested wording such as: *"This policy applies to all existing open spaces and recreational areas unless they are specifically allocated for development within this Local Plan."* **(Taylor Wimpey - Woodspring)**	It is not considered necessary to state that this policy doesn't apply it allocated sites, as the plan should be read as a whole so this is self-evident.
The Policy as drafted should be amended to clarify that development on open space/recreation space will also be permitted where identified through a local plan allocation. **(Persimmon Homes)**	It is not considered necessary to state that this policy doesn't apply it allocated sites, as the plan should be read as a whole so this is self-evident.
Appreciate the desire to ensure the loss of formal community open space, but argue the drafted policy is too broad and could apply to any green or blue space. Strong protection already exists through	The policy justification states that "*This policy specifically relates to managed open spaces which act as a focus for the community, contribute to community cohesion and visual amenity and are important for*



Local Green Space designation, which can be expanded through the Neighbourhood Development Plans process. The Council should publish a specific list of open spaces that the policy would apply in the supporting text and remove the following final sentence to the policy as set out in a suggested modification. **(Bellway Homes Ltd)**	*recreation and the local economy"*. It then goes on to list examples of open space to which this policy would apply.
Concern that the definition of open space used in this policy is too broad and that it suggests that all development proposals on unallocated greenfield land would conflict with this policy. **(Mead Realisations Ltd)**	The policy justification states that "*This policy specifically relates to managed open spaces which act as a focus for the community, contribute to community cohesion and visual amenity and are important for recreation and the local economy"*. It then goes on to list examples of open space to which this policy would apply.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support the intention of Policy DP52 to protect open and recreational spaces unless they are shown to be surplus, replaced with equivalent provision, or offset by alternative recreational benefits. **(Taylor Wimpey)**	Comments noted.
Suggested modifications:	
Remove the following final sentence to the policy: "*Development proposals affecting other green and blue spaces will only be permitted provided they do not adversely affect areas which make a worthwhile contribution to the amenity and/or the character, setting and visual attractiveness of the area*". **(Bellway Homes Ltd)**	



Development Policies: Countryside

DP53: Best and most versatile land

Policy DP53: Best and Most Versatile Land	
Number of representations received: 28	
Number of objections based on policy being unsound: 23	
Not positively prepared: 12 Not justified: 22 Not effective: 20 Not consistent with national policy: 15	
Number of objections based on policy being not legally compliant: 6	
Number of objections based on policy being not compliant with Duty to Co-operate 7	
Main Issues Raised:	**North Somerset Council Officer Response:**
Query why the policy only applies to non-allocated sites. If the allocation of BMV land is necessary to make the plan sound, DP53 should apply to development proposals for allocations, minimising loss of BMV agricultural land, as the proposed designation of Nailsea and Backwell would sterilise around 270 hectares of BMV of which most are Grade 1. The Local plan should guide development to areas of poorer quality agricultural land first. **(Backwell PC/Nailsea TC/Flax Bourton PC/Brockley PC/Backwell RA/Nailsea Action Group)**	As set out in the Best and Most Versatile Land background paper that was published as part of the evidence base, whilst the loss of any BMV land for residential development is regrettable, justification has been provided for those allocations for residential use on land that has been classified as Grade 1 or 2. The identification of these sites is further supported by the sustainability appraisal. Coupled with a policy approach to protect the remaining BMV land from speculative developments this is considered to be a proportionate approach to this issue.
Concerns that the policy is too prescriptive, requesting that where land is better quality it should be used for gardens and allotments may not be practicable from a design and layout perspective preventing maximisation of densities and should therefore be amended. **(Marcus Plaw Persimmon Homes)**	The policy approach is considered appropriate and is justified in Best and Most Versatile Land background paper. Design and layout will be assessed on a case by case basis at planning application stage.
The policy would likely constrain the delivery of commercial scale renewable energy contrary to the plans' wider ambitions towards net	The policy makes express provision for renewable energy production where the land could be returned to agricultural use without a loss of



zero. **(Stephanie Fowler, Strongvox Ltd, Taylor Wimpey – Youngwood Lane)**	quality.
The policy should be modified in accordance with Natural England Guidance. Reference to 'significant, inappropriate and unsustainable' proposals but does not set out criteria relating to scale, this is contrary to Natural England guidance which states that only losses over 20ha are significant, the policy does not set out any threshold. The strict criteria proposed will significantly restrict potential development on BMV land, ruling out opportunities for small scale development. **(Stephanie Fowler, Strongvox Ltd, Taylor Wimpey – Youngwood Lane, Diverse Partnerships Yatton, Taylor Wimpey, Crest Nicholson, Barratt, Redrow, Vistry, Thomas Catling Woodstock Homes)**	As explained in the Best and Most Versatile Land background paper, allocations have been considered through the plan-making process. This criteria-based policy will apply to development on any unallocated sites. This is considered to be an appropriate position, given the large scale releases on allocated sites.
The plan places an effective moratorium on development within BMV agricultural land with only very limited exceptions. This would constrain the rural exceptions policy (DP43) to grade 3A and below which may preclude rural exceptions sites from being delivered. If the policy is applied rigidly, it will effectively rule out proposals on even small pockets of BMV land, which contradicts the more balanced approach in the NPPF. The policy overall overrepresents considerations of BMV land and should consider the wider sustainability benefits as part of the planning balance. **(Stephanie Fowler, Strongvox Ltd, Taylor Wimpey - Youngwood Lane, Nailsea Holdings LVA LLP, Woodstock Homes – Land West of Butts Batch Wrington, Wain Homes Severn Valley Limited, Taylor Wimpey, Crest Nicholson, Barratt, Redrow, Vistry Group, Lands Improvement Holdings Ltd, Wain Homes, Diverse Partnerships Yatton)**	BMV is an important consideration in the planning balance at the decision-making stage. The policy strikes the right balance between protecting the highest quality agricultural land and ensuring land can still be used for appropriate uses in the right circumstances. Provision is made within the policy for consideration of the sustainability benefits of the proposal and whether they clearly outweigh the long-term loss of agricultural land.
The UK is heavily reliant upon imported food and the loss of land currently used for food production will exacerbate this. There is no clear distinction between the proportion of land which is classified as	The land classifications mapping referenced in the policy is that provided by Natural England for this purpose. The policy requires that in cases where the land classification is uncertain or classified as grade 3 without



Grade 3a and 3b, as a consequence the protection afforded to Grade 3a land is limited and no protection is afforded to 3b. Significant areas of land within Bleadon are currently used in relation to food production and are classified as Grade 3. They are vulnerable to development from (for example) renewable energy development, and this is likely to be compounded by pressure for landowners from aspects such as BNG. The wording fails to recognise the practical implications of any change of use upon existing communities. DP53 is contrary to the efficient use of land expectations in the NPPF and provides insufficient protection for agricultural land. The plan relies upon land classifications which are out of date. **(Bleadon Parish Council)**	further subdivision, a full survey will be required to establish its quality. In respect of renewable energy, the policy requires land used for this purpose to be capable of being returned to agricultural use without a loss of quality. We understand the local concerns around food production and food security, and consider that the local plan makes a proportionate, justified and robust approach to this issue.
Policy DP53 would make windfall or edge of settlement opportunities more difficult if sites contain small pockets of 3a land, reducing the scope for new homes and undermining the deliverability of the spatial strategy. **(Woodstock Homes - Land West of Butts Batch Wrington)**	A pragmatic approach will be taken if very small parts of larger sites are BMV. As set out in the policy, better-quality land should be preserved for gardens, allotments, community orchards or similar schemes which support local food production.
General objections to any loss of BMV land and concerns regarding food security. Brownfield land should have been considered first given. **(Cleeve Parish Council, Fran Slade, Guy Stone, Lucy Byrne, Rich Coleman, M Slade, J Slade, C Butler, Sarah Berridge, David Davies)**	The spatial strategy, site selection and capacity paper sets out the sequential approach that has been taken to identifying sites, and this did focus on urban intensification and previously developed land before assessing green field sites in relatively sustainable locations. The policy seeks to prevent the loss of further agricultural land to speculative development proposals.
Allocation of the site north of Nailsea is contrary to the policy as it is Grade 3 agricultural land. **(Wraxall and Failand Parish Council)**	The policy applies to unallocated sites.
Support/Other Comments:	**North Somerset Council Officer Response:**
We welcome the Local Plan's recognition of the countryside as a valuable resource and its commitment to protecting the best and most versatile (BMV) agricultural land. High-quality farmland underpins food security and supports resilient farm businesses that	Noted.



deliver benefits for climate and nature. NFU members strongly support the principle that Grades 1 and 2 land should be safeguarded from development, and we would like to see this commitment strengthened with clear wording that exceptions will only apply in cases of genuine necessity and with full restoration plans. **(National Farmers Union)**	
Support the protection contained within this Policy as the loss of BMV is unacceptable. **(Wrington Parish Council)**	Support welcomed.
Suggested modifications:	
Request for more explicit protection of Grade 3 and above land that is currently used to support food protection. **(Bleadon Parish Council)** Where a limited temporary use and the land and soil could be returned to its former quality, reinstatement should be contractually and legally secured. **(Cleeve Parish Council)** Suggestions that the sustainability planning balance provision that the policy applies to Grade 3 land should be extended to cover land in grades 1 and 2. **(Diverse Partnerships Yatton Ltd, Lands Improvement, Wain Homes, Wain Homes Severn Valley)** The policy should be amended to recognise that in some circumstances development avoiding parcels of better quality land may not be practicable from a design and layout perspective. **(Persimmon Homes)** DP53 should be amended to provide greater flexibility, consistent with the NPPF. The policy should distinguish between significant areas of BMV land and small inclusions and should recognise that sustainable development proposals may justify the loss of limited areas of 3a land where wider benefits clearly outweigh the harm, as set out in footnote 58 of the Framework. **(Nailsea Holdings LVA LLP)** The policy should be modified to include criteria reflecting 'significant' scale of BMV loss as over 20ha in accordance with Natural England	

guidance.
(Stephanie Fowler - Pegasus Group, Strongvox Ltd, Taylor Wimpey Youngwood Lane)

Amendment requested to ensure consistency with national policy.
(Taylor Wimpey, Crest Nicholson, Barratt Redrow, Vistry Group, Woodstock Homes)

The Policy wording should incorporate the exception set out in the supporting text that 'only where it can be demonstrated the sustainability benefits of the proposal outweigh the loss of this best and most versatile agricultural land will permission be granted'. **(Lands Improvement Holdings Ltd)**



DP54: Rural workers housing

Policy DP54: Rural workers housing	
Number of representations received: 1	
Number of objections based on policy being unsound: 0	
Not positively prepared: 0 Not justified: 0 Not effective: 0 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Proposals must be sequentially located to the lowest areas of flood risk, and should include temporary use of caravans. **(Environment Agency)**	Comments noted. Flood risk is dealt with in other policies namely DP9: Flood Risk.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
None	

DP55: Agriculture and land based rural businesses.

Policy DP55 Agriculture and land based rural businesses	
Number of representations received: 2	
Number of objections based on policy being unsound: 1	
Not positively prepared: 1 Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
New buildings must be sequentially located to the lowest areas of flood risk. Stockpiles must also be located away from flood zones and watercourses. **(Environment Agency)**	Comments noted. Flood risk is dealt with in other policies namely DP9: Flood Risk.
A more comprehensive policy is needed. The local plan should address agriculture and allocate significant areas of agricultural land, at the moment the impression is that agricultural land is a resource to be used for new housing. **(K Riches)**	Policy DP53 identifies the plans approach to protecting Best and Most Versatile Land. This policy is specifically about agricultural development.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
None	

DP57: Replacement dwellings in the countryside.

Policy DP57 Replacement Dwellings in the Countryside	
Number of representations received: 2	
Number of objections based on policy being unsound: 1	
Not positively prepared: 0 Not justified: 0 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Dwellings must be designed to reduce the risk of flooding, be two storey within flood risk areas and incorporate floor resilience measures where possible **(Environment Agency)**	Comments noted. Flood Risk is dealt with in DP9: Flood Risk.
Policy is unnecessarily onerous and out of step with broader Green Belt policy for house extensions which allows for limited extensions and alterations provided they do not result in disproportionate additions. The proposed restrictions discourage reasonable investment in existing homes, which has several negative implications. Home improvement projects stimulate the local economy by employing builders, tradespeople, and suppliers. Restrictive policies risk reducing this activity and harming local businesses. Allowing homeowners to extend or adapt their properties enables families to remain in their communities rather than being forced to relocate. This supports social cohesion and reduces pressure on housing supply. **(Kit Stokes)**	The aim of the policy is not to restrict home improvement projects, but to ensure sustainable development across North Somerset. The policy allows for the replacement of a single permanent dwelling in the countryside and permits a 50% increase in the external floor area of that replacement dwelling allowing for families to remain in their communities. It should also be recognised that significantly extending or increasing the size of properties can also result in pricing local people out of their local area due to a reduction in affordable market housing.



Support/Other Comments:	North Somerset Council Officer Response:
None	
Suggested modifications:	
None	



DP58: Conversion or re-use of rural buildings.

Policy DP58 Conversion or reuse of rural buildings	
Number of representations received: 1	
Number of objections based on policy being unsound: 0	
Not positively prepared: 0 Not justified: 0 Not effective: 0 Not consistent with national policy: 0	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Flood resilience measures to be incorporated where possible. Access and egress and location of sleeping accommodation to be considered as this type of building is often single storey. **(Environment Agency)**	Comments noted. Flood Risk is dealt with in DP9: Flood Risk.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
None	

DP59: Previously development land in the countryside

Policy DP59 Previously developed land in the countryside	
Number of representations received: 3	
Number of objections based on policy being unsound: 2	
Not positively prepared: 0 Not justified: 1 Not effective: 1 Not consistent with national policy: 2	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Flood resilience measures to be incorporated where possible. **(Environment Agency)**	Comments noted. Flood Risk is dealt with in DP9: Flood Risk.
Object to the policy because it is more onerous than Green Belt policy in the NPPF, imposing stricter limitations may create barriers to sustainable development, stifling rural regeneration, re-use of land and previously developed sites. **(Kit Stokes)**	The policy provides a proportionate and flexible approach to the redevelopment of PDL in the countryside ensuring the most appropriate and sustainable re-use of land and buildings.
It is inappropriate for the policy to state that residential use will only be permitted if it can be demonstrated that all attempts to secure an employment or alternative use have been unsuccessful. The approach is also inconsistent with the rest of the plan. **(Leigh & Glennie Ltd)**	The policy gives priority to economic uses over residential uses as residential uses should be located at the towns and more sustainable villages rather than in the countryside in accordance with the spatial strategy.
Support/Other Comments:	**North Somerset Council Officer Response:**
The policy is a positive one as it supports the redevelopment of land (in specific circumstances) and there is a positive aspiration to the policy, seeking environmental, economic or social benefits **(Leigh & Glennie Ltd)**	Comments noted.

Suggested modifications:
Policy DP59 should be modified by deleting the following paragraph: *Residential use will be permitted if:* *• It can be demonstrated that all attempts to secure an employment or alternative use have been unsuccessful; and* *• The location is close to an existing settlement with a good range of facilities and services.* **(Leigh & Glennie Ltd)**



DP60: Employment on green field land in the countryside

Policy DP60 Employment on greenfield land in the countryside	
Number of representations received: 3	
Number of objections based on policy being unsound: 2	
Not positively prepared: 2 Not justified: 2 Not effective: 1 Not consistent with national policy: 2	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
New buildings must be sequentially located in areas of lowest flood risk. Buildings should be designed to reduce risk of flooding, both now and from climate change. Flood resilience measures to be incorporated where possible. **(Environment Agency)**	Comments noted. These requirements are covered in Policy DP9: Flood risk.
Objection is raised to this policy as it is overall restrictive and inconsistent with national policy. **(Mead Realisations)**	No details are given on the perceived conflict with national policy so it is difficult to respond to specific concerns. The overall approach of the policy is to steer employment uses to the most sustainable locations where there is good access to and for the workforce.
The settlement boundary surrounding Yatton actively prevents the growth of a major employer in a sustainable location contrary to local and national objectives. **(Smart Systems)**	The local plan balances the need for economic growth with the protection of the environment and the countryside.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	

Suggested modifications:
The further expansion of the settlement boundary as advocated above; or An amendment to policy DP60 to add in a further exception; - “the development relates to the expansion of existing premises and business sites where this does not have an adverse impact on the character or appearance of the locality”. **(Smart Systems Ltd)**

DP61: Existing businesses in the countryside

Policy DP61: Existing businesses in the countryside	
Number of representations received: 2	
Number of objections based on policy being unsound: 1	
Not positively prepared: 1 Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
New buildings must be sequentially located at areas of least risk of flooding. Buildings should be designed to reduce risk of flooding. Flood resilience measures should be incorporated where possible. **(Environment Agency)**	Comments noted. These requirements are covered in Policy DP9: Flood risk.
Objection to the policy as it would unreasonably restrict the expansion of existing businesses in the countryside. This is of particular concern in relation to large employers which contribute significantly to the local economy **(Mead Realisations Ltd)**	The local plan balances the need for economic growth with the protection of the environment and the countryside. The policy as written is flexible enough to allow for expansion of rural business if the need is fully justified and would not be harmful to the character and appearance of the countryside.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	
Suggested modifications:	
The policy should be amended to remove 'Proposals to extend outside the curtilage into surrounding countryside will need to be fully justified and not be harmful to the character and appearance of the countryside. Retailing other than proposals that are strictly ancillary to the main use or proposals under 200m2 will not be permitted'. **(Mead Realisations Ltd)**	



DP62: Visitor accommodation in the countryside including camping and caravanning

Policy DP62: Visitor accommodation in the countryside including camping and caravanning	
Number of representations received: 2	
Number of objections based on policy being unsound: 1	
Not positively prepared: 1 Not justified: 1 Not effective: 1 Not consistent with national policy: 1	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
New buildings must be sequentially located in the areas of lowest flood risk. New and existing development must be designed to reduce the risk of flooding both today and with climate change. Flood resilience measures to be incorporated where possible. **(Environment Agency)**	Comments noted. These requirements are covered in DP9: Flood risk.
Policy would unreasonably restrict provision of visitor accommodation which could provide an important contribution to the local economy. **(Mead Realisations Ltd)**	Policies restrict permanent residential development in the countryside in order to avoid loss of open countryside and to encourage more sustainable patterns of development where dwellings are located within existing settlements closer to facilities and services. To achieve this it is therefore necessary to restrict subsequent conversion to permanent dwellings. It is reasonable to expect the re-use of existing buildings rather than the construction of new buildings in order to avoid unsustainable development in the countryside.
Support/Other Comments:	**North Somerset Council Officer Response:**
None	

Suggested modifications:

The policy should be amended as follows;

The development will not result in an ***unacceptable*** adverse effect on the landscape or settlement character of the area due to the proliferation of tourist accommodation;

Remove all the following bullet points:

- The proposal would result in an enhancement of the immediate setting, and the impact of external facilities (curtilage treatment, parking) is minimal and landscaping respects the local rural character; and
- The re-use of existing buildings is given priority over new development and only where no suitable buildings are available will new development be acceptable;
- For new build and conversions, subsequent applications to change holiday accommodation to permanent residential use or the removal of conditions for holiday accommodation will not be permitted within 10 years of their construction unless the existing use is shown to be unviable. Caravan parks and lodges will be conditioned to ensure they are used solely for holiday use. Proposals to use mobile homes on longstanding existing holiday parks for permanent residential accommodation will only be permitted if:
    - They are outside flood zone 3; and
    - They are easily accessible in relation to existing facilities and services

(Mead Realisations Ltd)



Delivery Policies

DP63: Infrastructure delivery and developer contributions

Policy DP63 Infrastructure Delivery and Development Contributions	
Number of representations received: 16	
Number of objections based on policy being unsound: 12	
Not positively prepared: 5 Not justified: 8 Not effective: 9 Not consistent with national policy: 7	
Number of objections based on policy being not legally compliant: 1	
Number of objections based on policy being not compliant with Duty to Co-operate 4	
Main Issues Raised:	**North Somerset Council Officer Response:**
Reference to coastal management schemes and flood mitigation in the IDP are not clear and nor are the funding mechanisms for them. **(Mead Realisations)**	Whilst the IDP contains a broad category for coastal defence infrastructure, the specific schemes and their funding routes are not confirmed. The IDP will be subject to ongoing annual review with schemes review taking place. When additional detail is available this will be added.
Policy supported, however request from Environment Agency to expand policy to include contributions towards maintenance and upgrades to flood defences from any Risk Management Authority. **(Environment Agency)**	The policy includes an appropriate level of detail and is not intended to be a compendium of all items that development contributions will be sought for.
Policy should provide clarity on the use of CIL and S106 so as to ensure no overlap or duplications. **(Persimmon Homes)**	The planning practice guidance is clear that authorities can choose to pool funding from different routes to fund the same infrastructure provided that authorities set out in infrastructure funding statements which infrastructure they expect to fund through the levy. The IDP provides further detail on the funding sources anticipated for each infrastructure item identified.
Support requirement for infrastructure to be delivered in step with development and support the coordination of necessary investment	It is not considered necessary for this to be covered within the policy, which relates to development contributions rather than planning



through the IDP, however propose addition to the policy to refer to mitigations that may need to be secured by way of planning conditions or funding agreements as per DFT Circular 01/2022. **(National Highways)**	conditions.
The policy should include reference to flexibility in the case of site-specific viability issues. **(Home Builders Federation)**	It is not considered necessary for this to be covered within the policy, contributions and obligations will be considered on a case-by-case basis through planning applications.
There is no reference to electricity infrastructure in the policy. **(National Grid Electricity Distribution)**	The policy includes an appropriate level of detail and is not intended to be a compendium of all items that development contributions will be sought for.
A breakdown of how education contributions are calculated should be provided within the policy. **(Vistry Group)**	This level of detail is not considered necessary within the policy, however additional detail will be located in the IDP and in supplementary guidance in due course.
The policy wording should expressly reference the statutory tests in Regulation 122 of the CIL Regulations. **(Taylor Wimpey Crest Nicholson Barratt Redrow and Vistry Group)**	It is not considered necessary to repeat the tests in the policy, given their status in the regulations and the fact that they are repeated in national policy.
The viability evidence base should be updated. **(Barratt Bristol, Rubix Strategic Limited)**	Plans are required to be based upon proportionate evidence. The Viability Assessment published in November 2023 remains fit for purpose, and an addendum was produced to consider the additional sites added to the plan in October 2025.
The policy does not make reference to off-site recreational pressures within the Mendip Hills National Landscape resulting from new developments. **(Ian Bowen, Mendip Hills National Landscape Unit)**	The policy includes an appropriate level of detail and is not intended to be a compendium of all items that development contributions will be sought for.
Support/Other Comments:	**North Somerset Council Officer Response:**
Observation that electricity generation methods are rapidly changing and that changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity may be needed. Guidance and advice is provided. **(National Grid Electricity Transmission)**	Noted.



The Local Plan does not contain an Infrastructure Delivery Plan. **(Peter Sims)**	The policy refers to the Infrastructure Delivery Plan, which is a standalone document. Drafts of the IDP have been published at each stage of plan making, and an updated version will be submitted with the plan for examination.
Request from the NHS Bristol, North Somerset and South Gloucestershire ICB for various amendments to the Infrastructure Delivery Plan. **(BNSSG ICB)**	The council are continuing to engage with the ICB and NHS colleagues to ensure the IDP reflects their evidenced needs.

Suggested modifications:

Request from Environment Agency to expand policy to include contributions towards maintenance and upgrades to flood defences from any Risk Management Authority.
(Environment Agency)

Propose addition to the policy to refer to mitigations that may need to be secured by way of planning conditions or funding agreements as per DFT Circular 01/2022.
(National Highways)

The policy should include reference to flexibility in the case of site-specific viability issues.
(Home Builders Federation)

There should be reference to electricity infrastructure explicitly in the policy.
(National Grid Electricity Distribution)

A breakdown of how education contributions are calculated should be provided within the policy.
(Vistry Group)

The policy wording should expressly reference the statutory tests in Regulation 122 of the CIL Regulations.
(Taylor Wimpey Crest Nicholson Barratt Redrow and Vistry Group)

Request for the following wording to be added to the policy:
“Regardless of the provision of local community facilities, occupiers of new development within or near the designated Mendip Hills National Landscape are likely to resort to key routes and destinations within the area to enjoy outdoor recreation including by foot, cycling and horse riding.



Where appropriate, s106 and/or Community Infrastructure Levy monies will be secured to mitigate off-site harm and/or enhance facilities commensurate with increased recreational pressures resulting from the development.”.
(Ian Bowen, Mendip Hills National Landscape Unit)



DP64: Adoption of open space and green infrastructure

Policy DP64: Adoption of open space and green infrastructure	
Number of representations received: 6	
Number of objections based on policy being unsound: 5	
Not positively prepared: 3 Not justified: 3 Not effective: 5 Not consistent with national policy: 4	
Number of objections based on policy being not legally compliant: 0	
Number of objections based on policy being not compliant with Duty to Co-operate: 0	
Main Issues Raised:	**North Somerset Council Officer Response:**
Concern that the proposed requirement for resident-led management structures lacks sufficient detail and guidance. **(Diverse Partnerships Yatton Ltd, Strongvox Ltd, Taylor Wimpey Youngwood Lane, Stephanie Fowler)**	The policy position is clear that there is an expectation that open space and green infrastructure should be adopted, and the provision for resident-led management companies is a fallback position. It is not considered necessary for the policy to be overly prescriptive, with the wording as drafted clear that: *Details of the management committee structure must be submitted for approval and should have a majority resident representation with no affiliation to the developer or associated firms*.
No clear evidence to demonstrate why adoption by the council is necessary in all cases. Risks of the failure of private management companies can be adequately mitigated through planning conditions and legal agreements. **(Savills on behalf of Taylor Wimpey, Crest Nicholson, Barratt Redrow and Vistry Group)**	The policy sets out adoption as a clear expectation and that this will be encouraged, although does allow for management companies in the alternative. The risks of failure of management companies leave residents unfairly exposed to excessive service charge increases and the council and local people with poorly maintained infrastructure. This is not acceptable, and as such the policy intends to provide safeguards from these risks.
Support/Other Comments:	**North Somerset Council Officer Response:**
Support for policy approach. **(Environment Agency)**	Support welcomed.



Suggested modifications:
Suggestion that there should be guidance provided in the policy which details how a residential-led management structure is justified to manage the open space and guidance on how one can be formed which would follow the same maintenance procedures. **(Diverse Partnerships Yatton Ltd, Strongvox Ltd)**



Schedules, sites and designations

The plan contains 8 schedules that list sites and designations made under policies in the plan. The following table lists these and sets out how comments against the schedules have been recorded.

Schedule	Policy reference	Number of comments made	Where these are addressed
Schedule 1: Large sites for residential development	LP5	1,573	Separate table below
Schedule 2: Employment sites	LP5	9	Separate table below
Schedule 3: Local Green Space	LP15	34	Within responses to Policy LP15
Schedule 4: Community facilities	LP6	5	Within responses to Policy LP6
Schedule 5: Settlements with settlement boundaries	LP7	11	Within responses to Policy LP7
Schedule 6: Town, district and local centres	LP8	1	Within responses to Policy LP8
Schedule 7: Transport infrastructure, allocations and safeguarded routes	LP11 & DP16	44	Within responses to Policy LP11
Schedule 8: Gypsy and Traveller sites	DP44	1	Within responses to Policy DP44



Schedule 1: Large sites for residential development

Site name	Number of representations received	Main issues raised	Officer response
STRATEGIC GROWTH LOCATIONS			
Weston-super-Mare			
Wolvershill (north of Banwell)	5	Note that the developers are collaborating to prepare a comprehensive masterplan for the site. **(Ainscough Strategic Land, Bellway Homes)**	This co-ordinated approach is welcomed.
		Detailed noise modelling will be required. **(National Highways)**	Noted. This will be addressed through planning applications.
		Concern regarding the impact this large development will have on the existing road network, particularly the A371, and specific references to the construction phase. **(Paul Waitkins, Tessa Reece)**	The transport assessment that forms part of the local plan evidence base has considered this and a number of measures are identified in the plan to mitigate transport impacts. This will be considered in further detail through planning applications, and Construction



			Management Plans will be required.
		Concern that local services and amenities cannot support this level of development. **(Tessa Reece)**	This development is being planned comprehensively as a strategic site to ensure that all the necessary infrastructure and facilities are delivered alongside the housing growth.
		Development of the site will harm the environment and have a negative impact on local ecology. **(Tessa Reece)**	These matters have been considered through the HRA that forms part of the evidence base for the plan. Other policies in the plan will continue to apply, to ensure biodiversity net gain is achieved.
		The policy should allow flexibility in the location boundary rather than fixing it rigidly on the policies map. **(Ainscough Strategic Land)**	It is appropriate for the plan to identify an indicative boundary for the development.
Woodspring (South West Bristol)			
Woodspring	0	-	-
Nailsea and Backwell			



Land at north west Nailsea	38	The proposal conflicts with the Wraxall and Failand Neighbourhood Plan (2022-2038) and this ambition to preserve this land and prevent it from being developed. That plan strongly protects the Green Belt and rural character. **(A Bannister, David Coates, J Smallbone, Jane Evans, Joan Bannister, Patrick Smallbone, R Bowden)**	This site is an extant allocation in the adopted Sites and Policies Plan Part 2, and part of the site has planning permission for 150 dwellings. The Wraxall and Failand Neighbourhood Plan was prepared within the context of the previously adopted development plan documents and there is no requirement for the emerging local plan to be in conformity with it.
		This is an important wildlife corridor which will be harmed and fragmented as a result of development. Developing adjacent to the Tickenham, Nailsea and Kenn Moor SSSI and Moor End Spout Nature reserve would destroy valuable wildlife habitat and harm biodiversity. Greater and Lesser Horseshoe bats, which are protected species, have been identified as foraging on the site. Lots of endangered birds and mammals use the site e.g. hedgehogs, badgers, otters and owls. Concerns there will be a loss of existing trees and hedgerows which are critical to survival of many species – mitigation measures are not comparable to well established habitats. Concern that new development will make light pollution worse and new artificial outdoor light will disrupt the natural patterns of birds and mammals, particularly light sensitive	A significant proportion of this site has already secured planning permission. The local plan is supported by the HRA, and any further parcels will be subject to additional ecological investigation at the planning application stage.

		horseshoe bats. **(A Dyer, A Bannister, Ian Bloom, J Skelton, Jane Evans, Janet Court, Joan Bannister, Joe Tallis-Chisnall, M G West, Margot Held, Maureen Brady, Nailsea Action Group, PJ Trenchard, Patrick Smallbone, R Crabtree, S Johnson, Susie Bevan)**	
		Having access to open green spaces is essential for people's wellbeing and health. Building on the Green Belt north of Nailsea will reduce access to nature for the town's residents. It is an important recreational space which is highly valued by local residents. **(A Bannister, David Coates, J Skelton, J Smallbone, Joan Bannister, Joe Tallis-Chisnall, Karen Bird, Nailsea Action Group, PJ Trenchard, Patrick Smallbone, R Bowden, S Johnson, W Morrison, E Morrison)**	This site is not in the Green Belt.
		The aviation fuel pipeline is not mentioned as a constraint, nor has the issue been addressed. Concern its presence may render mortgages and insurance difficult for safety reasons. Relevant authorities such as Exolum UK Ltd have not been consulted. **(A Bannister, J Smallbone, Jane Evans, Joan**	The presence of this pipeline will be addressed through development proposals with site layout determined accordingly. The presence of any utilities on site is typically picked up during initial site investigations and baseline surveys prior to development



		Bannister, Patrick Smallbone, R Bowden)	proposals being developed. Exolum Pipeline Services are consulted upon the local plan at each stage and have responded accordingly.
		Concerns are raised about the impact of this development on the surrounding rural road network which does not have additional capacity to be able to cope with increased volumes of traffic. Traffic impacts have not been properly assessed and additional traffic from the development will have negative effects for pedestrians and cyclists. Church Lane/The Causeway is identified as a problematic rat run which is used by traffic cutting through from the B3130 to Nailsea and Backwell. The Causeway bridge is said to be heavily damaged because of the volume of traffic using it. There are concerns that this will get worse with new construction work due to the number of deliveries. **(A Barker, Brian O'Donovan, Bryn Jones, Chris Dobbs, David Coates, David Phillip Charles Trump, Ian Bloom, J Skelton, J Smallbone, Jane Evans, Janet Court, Joan Bannister, Joe Tallis-Chisnall, K Gardner, Karen Bird, M G West, Maureen Brady, Maureen Brady, Nailsea Action Group, P Jones, PJ Trenchard, Patrick Smallbone, R Bowden, Tickenham Parish Council, W Morrison, E Morrison)**	Noting that the majority of the site now has outline consent, the local plan and its proposed development allocations have been subject to transport assessment to identify any adverse impacts upon the local road network. This has led to the proposed mitigations in the local plan to support growth. The Transport Assessment Appendix E is the Nailsea and Backwell Transport Strategy and this provides a package of transport mitigation required to address the cumulative impact of proposed development. These mitigations are translated into the Infrastructure Delivery Plan.

		Cumulative development of 1,817 homes constitutes a massive overdevelopment of the town. No strategy or funding in place to deal with these impacts and provide improved services if development occurs. The proposal for new primary schools is dependent on the developer and no locations have been identified. **(A Dyer, Bryn Jones, Ian Bloom, Ian Bloom, J Skelton, Jane Evans, Janet Court, Karen Bird, M G West, Maureen Brady, R Crabtree, W Morrison, E Morrison)**	The majority of this particular site already has planning permission, through which proportionate contributions were secured. The IDP identifies the infrastructure requirements for Nailsea and Backwell over the plan period, and the Local Plan allocates new education provision for both Nailsea and Backwell.
		The proposed cross-rail link road would have limited benefit for the area as it would not serve Nailsea, reduce traffic along Station Road, or help with traffic travelling between Nailsea and the M5. It is likely to be very expensive and potentially difficult to develop due to the railway and the River Kenn. Various alternative solutions are suggested. **(A Dyer, Bryn Jones, David Phillip Charles Trump, Ian Bloom, J Skelton, Maureen Brady, W Morrison, E Morrison, Tickenham Parish Council)**	The Transport Assessment work undertaken throughout the plan-making process has considered various alternative mitigations, and sets out the background to the identification and benefit of the Cross Rail Link as part of a package of mitigation for the Nailsea and Backwell area. The IDP provides timescales and costings.
		It is felt that Nailsea and Backwell station would not work well as a transport hub because the platforms are inaccessible for disabled people and problematic for	The plan identifies access improvements to the station are required and a proposed modification allows for the potential relocation



		families with young children. The facilities at the station are poor – no indoor waiting space, toilets and only a part time ticket office. The Plan relies heavily on the railway station despite acknowledging major accessibility, car parking, safety and capacity issues, and provides no measures to address them or improve active-travel access. **(A Dyer, Chris Dobbs, Ian Bloom, J Skelton, Janet Court, K Gardner, Patrick Smallbone, W Morrison, E Morrison)**	subject to feasibility.
		It is Grade 2 agricultural land which should be preserved for food production. **(J Skelton, Nailsea Action Group, W Morrison, E Morrison)**	The NPPF does not preclude development on best and most versatile land and this is one of a range of factors that have been taken into account in deciding the proposed allocations. According to the most recent mapping from DEFRA this land is Grade 2. This is addressed further in the Best and Most Versatile Land Background Paper.
		The Environment Agency agree with the site requirements in areas at risk of future flooding. **(Environment Agency)**	Noted.



		The Causeway, Washing Pound Lane and Church Lane are rural lanes and although proposed to be classified as Rural Quiet Lanes there are no proposals in the transport section of the Infrastructure Delivery Plan to provide any works to improve them or reduce traffic onto them. **(David Phillip Charles Trump, Tickenham Parish Council)**	Schemes are set out in the IDP including packages that include Rural Quiet Lane elements.
		The developer is intending to deliver 30% affordable homes with a tenure split between affordable rent and shared ownership and a mix of housing types, including family homes. There will be provision of new community recreation spaces and linear attenuation basins to offer a wetland habitat for wildlife. **(Vistry Group)**	Noted.
		Nailsea Action Group is broadly supportive of this development, as some requested changes were made in the Site Requirements relative to the requirements in the adopted Sites and Policies document, including the reduction of site capacity to 225, PROW links to Causeway View, relocation or enhancement of Fryth Way sports pitch, and protection of adjacent Tickenham,	Support welcome.



		Nailsea and Kenn Moor SSSI. **(Nailsea Action Group)**	
Youngwood Lane, Nailsea	14	Development at this site will worsen existing traffic and congestion/road safety issues, especially around Nailsea and Backwell railway station at Station Road/Bucklands Batch, the junction of Wraxall Hill and the B3128 (Clevedon Road), Chelvey Road, Chelvey Lane, Netherton Wood Lane, Brockley Lane, Brockley Way, Portbury Lane and Lower Claverham Lane. There needs to be a commitment to upgrading local public transport and active travel routes to reduce car dependency. **(Chris Foggin, Craig Andrews, E Morrison, G Faulkner, J Eade, Karen Bird, M Davis, Margot Held, Peter Jennings, Sue Francis, Susie Bevan, W Morrison)**	This site already has planning consent and is under construction.
		Development of this site will result in the loss of Best and Most Versatile Agricultural Land. **(Chris Foggin, E Morrison, Margot Held, Peter Jennings, Susie Bevan, W Morrison)**	This site already has planning consent and is under construction.
		The rural character of the area will be ruined by the cumulative development around Nailsea (including this	This site already has planning consent and is



		site) and this will negatively impact the health and wellbeing of local residents as it will make it harder for them to access green open space. It will result in a dramatic change to the landscape that will be a huge loss to the area. Prioritise brownfield sites over agricultural land wherever possible. **(Chris Foggin, E Morrison, Margot Held, S Johnson)**	under construction.
		Public services and facilities (e.g. doctor's, schools, shops, leisure) within Nailsea are at capacity and will not be able to cope with increased demand due to population growth in the area of 1,817 homes. This constitutes a massive overdevelopment of the town. No strategy or funding in place to deal with these impacts and provide improved services if development occurs. The proposal for new primary schools is dependent on the developer and no locations have been identified. **(Craig Andrews, E Morrison, G Faulkner, J Eade, Karen Bird, Peter Jennings, Sue Francis, Susie Bevan, W Morrison)**	This particular site already has planning permission and is under construction. The IDP identifies the infrastructure requirements for Nailsea and Backwell over the plan period, and the Local Plan allocates new education provision.
		Developments like Youngwood Lane are too far from services in the centre of Nailsea to make walking or cycling a realistic option. It is an uphill route between the	This site already has planning consent and therefore these matters have already been considered.



		site and the centre of Nailsea, which is less attractive for active travel to local services. **(Craig Andrews, J Eade)**	
		Trees, hedgerows and green spaces should be preserved throughout the site and integrated into the masterplan. **(Margot Held)**	This site already has planning consent and therefore these matters have already been considered.
West of Engine Lane, Nailsea	1	No comment made against this site. **(Tickenham Parish Council)**	Noted.
Land south of The Uplands, Nailsea	1	Objection to the site as within the Green Belt and at risk of flooding. **(S Johnson)**	This particular site is not within the Green Belt, has planning permission and is under construction nearing completion.
Weston College Site, Somerset Square, Nailsea	0	-	-
Trendlewood Way, Nailsea	3	The cumulative development of 1,817 homes is disproportionate for the size of the town and the local infrastructure will not be able to support this level of	This site already has planning consent and is under construction.



		growth. **(E Morrison, Terri Mazur, W Morrison)**	
		Objections on the grounds of highways impact, lack of rail provision, loss of green space, flood risk, accessibility to services and facilities and loss of Green Belt around Nailsea. **(E Morrison, Terri Mazur, W Morrison)**	This site already has planning consent and is under construction.
7 Clevedon Walk, Nailsea	0	-	-
Land north of Nailsea	43	Concern raised about releasing this land from the Green Belt and doubt over whether the development will meet the 'Golden Rules' set out in the NPPF for release, especially as it is felt that the affordable housing requirement will not be financially viable. The council has failed to demonstrate adequately that development on Previously Developed Land has been exhausted. Many feel the land should therefore retain its Green Belt status. **(A Bryant, A Burgess, A Eastwood, Chris Jenks, David Martin, J Panes, Jackie Kemmish, Jason Pitchers, Judy Hall, Karen Bird, Kate McKee, Marianne Claire Nolan, Nailsea Action Group, P Roberts, P Evans, Ian**	Due to the increase in North Somerset's housing requirement through the introduction of the mandatory standard method in the NPPF (Dec 2024) North Somerset cannot sustainably meet its housing requirement on sites outside the Green Belt. This constitutes exceptional circumstances and, in such instances, the NPPF directs local authorities to review their Green Belt boundaries and propose alterations to meet their housing need in full. As such North Somerset have undertaken a two stage Green Belt review



		Edmondson, Power Family, R Burgess, S Hall, Tickenham Parish Council, E Morrison, Sally Ambrose)	and released land from the Green Belt for housing allocations. Brownfield land has been considered sequentially preferrable, as set out in the Spatial Strategy, Site Selection and Capacity Paper.
		Objection is made to attempts to alter parish boundaries to facilitate development. **(J Panes)**	Parish boundaries are not a planning factor in identifying proposed allocations within the local plan.
		It is felt that the proposal to cumulatively build 3,500 homes around Nailsea and Backwell constitutes overdevelopment and that public services and facilities will not be able to cope with the population increase this will cause. It is felt that the development proposed is disproportionate to the size of the existing town and village. Query raised as to where the new primary school will be located and who will pay for it. It is requested that planning obligations (e.g. Section 106), fund improvements to schools, healthcare, and utilities to accommodate population growth. **(A Burgess, Alan Hooley, Andrew Sellers, Chris Jenks, D J Smith, Diane, Gill Brown, Karen Bird, Margot Held, Marianne Claire Nolan, Marianne Claire**	We note the concerns and would like to reassure residents that we are committed to ensuring that infrastructure is delivered as required, as well as measures to ensure key character features are retained and protected. The identification of Nailsea and Backwell as a strategic location is justified and in accordance with the spatial strategy. The selection of sites, and how they accord with that strategy is set out in the Spatial Strategy, Site Selection and Capacity Paper. New primary schools are allocated at Grove Farm, East of Backwell, and South of Nailsea allocations. Development contributions will be



		Nolan, P Evans, Peter Jennings, Ian Edmondson, R Burgess, Resident, S Steel, Sarah Robbins, Susie Bevan, Sally Ambrose)	collected from all developments in the area to fund all of the necessary mitigations and improvements, as set out in the IDP.
		Land to the south of Nailsea is grade 2 agricultural land which is good quality, high yielding land which will be permanently lost due to this development. It is felt this is against national policy which states that highest quality land must be protected. **(A Burgess, Diane, Nailsea Action Group, S Hall, Sarah Robbins, Susie Bevan, E Morrison, Sally Ambrose)**	The Best and Most Versatile Agricultural Land Background Paper (May 2026) sets out the approach to this issue.
		Concerns regarding ecological impact of development in this location as it will result in the loss of mature trees, historical hedgerows, and the wider destruction of an important wildlife corridor along the Land Yeo valley which stretches from Tickenham to Wraxall. It is an important space where local residents interact with nature for their health and wellbeing. Developing on this land will destroy important wildlife habitats and foraging corridors. It is argued that the site itself supports a high diversity of species. **(A Burgess, Andrew Lowe, Andrew Sellers, Chris**	The site has been considered as part of the HRA which concludes that the allocation is of low-moderate suitability for SAC bats and has low-moderate connectivity with known roosts in the area. Whilst there are potential adverse impacts on functionally linked land this can be addressed through mitigation measures. Detailed surveys to assess and mitigate ecological impacts will be considered through a planning application.



		Jenks, D J Smith, David Martin, Diane, J Panes, Gill Brown, Jackie Kemmish, Jason Pitchers, Joe Tallis-Chisnall, Judy Hall, Kate McKee, Margot Held, Marianne Claire Nolan, Nailsea Action Group, P Roberts, P Evans, Peter Jennings, Ian Edmondson, R Burgess, Resident, Ruth Pitchers, S Hall, Sarah Robbins, Susie Bevan, E Morrison, Sally Ambrose)	
		Concern about the increase in vehicular traffic caused by cumulative development within Nailsea and Backwell, including this site. It is felt that the entrance for the site along with the traffic generated from it would negatively impact road safety for vulnerable road users – pedestrians, cyclists and horse riders. The B3130 between Jacklands Bridge (BS21) and the junction with the B3138 (Tickenham Hill) at Stone Edge Batch is particularly problematic as it is very narrow with no footpaths on either side of the carriageway. It is felt that people will be reliant on private cars and improvements to public transport or active travel are requested (e.g. increase bus frequency). No sufficient improvements have been suggested to the road network around Nailsea to accommodate the rise in vehicles, alleviate congestion and improve safety. Concern that upgrades proposed in the Infrastructure Delivery Plan (IDP) lack analysis and costings, and there are no funding guarantees, so	The Local Plan and its proposed development allocations have been subject to transport assessment to identify any adverse impacts upon the local road network. This has led to the proposed mitigations in the local plan to support growth. The Transport Assessment Appendix E is the Nailsea and Backwell Transport Strategy and this provides a package of transport mitigation required to address the cumulative impact of proposed development. These mitigations include highway improvements as well as active and sustainable transport measures. These are translated into the Infrastructure Delivery Plan, and a detailed version with costings and timescales is submitted alongside the Local Plan for examination.

		concerns that these projects won't be delivered. Suggestion has been made about dualling the A370 to provide better road links between the town and the M5 to relieve traffic around Nailsea and Backwell. **(A Burgess, A Eastwood, Alan Hooley, Andrew Lowe, Andrew Sellers, Andrew Sellers, Gill Brown, Jackie Kemmish, Jason Pitchers, Joe Tallis-Chisnall, Judy Hall, Karen Bird, Kate McKee, Margot Held, Marianne Claire Nolan, Nailsea Action Group, P Roberts, P Evans, Paul Keen, Peter Jennings, Ian Edmondson, Power Family, R Burgess, Resident, Sarah Robbins, Susie Bevan, Tickenham Parish Council, E Morrison)**	
		It is felt that the railway station is currently inaccessible for people with mobility issues and has capacity constraints due to short platforms, therefore doubt is raised over whether it will be able to accommodate this level of growth within Nailsea and Backwell and alleviate traffic issues. **(A Burgess, Chris Jenks, D J Smith, Diane, Gill Brown, Josh Dyer, Judy Hall, Kate McKee, Resident, Sarah Robbins, E Morrison)**	The Local Plan 2041 seeks improvements to accessibility of the station to address these concerns, and a proposed modification allows for potential relocation subject to feasibility.
		The allocation will be harmful to the openness of the Green Belt and the rural character of the area, making the	The Wraxall and Failand Neighbourhood Plan was prepared within the context of the



		valley between Nailsea and Tickenham much more urbanised. This goes against the Neighbourhood Plan for Wraxall which aims to preserve the green belt and enhance the rural landscape. It is requested that the development incorporates public green spaces and maintain rights of way to ensure residents retain access to nature for wellbeing. **(A Eastwood, Margot Held, Ruth Pitchers, Sarah Robbins, Sally Ambrose, Jackie Kemmish, Jason Pitchers, Kate McKee)**	previously adopted development plan documents and there is no requirement for the emerging local plan to be in conformity with it. The development will be required to incorporate public green spaces and maintain rights of way to ensure residents retain access to nature for wellbeing.
		Flood risk issues must be addressed, there are reports of localised flooding in the area. Waterlogged fields are referred to, along with concerns of additional impermeable surfaces exacerbating flooding and increasing run off. Flood risk and drainage assessments are requested. **(A Eastwood, Andrew Lowe, J Palmer, David Martin, Diane, Jackie Kemmish, Joe Tallis-Chisnall, Josh Dyer, Judy Hall, Karen Bird, Kate McKee, Margot Held, Nailsea Action Group, P Roberts, P Evans, Peter Jennings, Power Family, V Parfitt, S Hall, Susie Bevan, Tickenham Parish Council, Sally Ambrose)**	The Local Plan is supported by a SFRA Level 1 and Level 2 document that provides an evidence base as to the current and future flood constraints across North Somerset. The proposed allocations have been considered through the SFRA to identify the extent of flooding affecting them. The site is not indicated to be at extensive flood risk however site-specific flood risk assessment would be required at planning applications stage that should provide further detail. In line with PPG, where surface water flooding

			is an issue the priority is to ensure the development can be made safe for its lifetime and to avoid vulnerable development on more constrained parts of the site through effective masterplanning.
		Concern that the employment and industrial land requirements for the allocation will not be financially viable for the developer and may impact the delivery of affordable housing on the site. **(A Eastwood, Diane Snape, J Panes, Ian Edmondson)**	Officers do not consider that the policy requirements for this site will render it unviable.
		The Sustainability Appraisal does not demonstrate that reasonable alternatives were considered, including brownfield sites, urban intensification, and locations with better infrastructure and sustainable transport access. **(Joe Tallis-Chisnall)**	This is not agreed. The SA has considered a range of reasonable alternative sites, and urban brownfield sites already form a significant component of planned development in the Local Plan.
		The developer states that the proposals for the site have now changed and they estimate the site can now accommodate 429 dwellings, which reflects the deletion of the care home element and increase in densities in	Noted. The capacities listed in the plan are indicative, and on this particular site were based upon the initial proposals from the developer. We understand that these are under review through the planning application



		western and central parts of the site. **(Nailsea Holdings LVA LLP)**	that is currently under consideration.
Land off Pound Lane, Nailsea	18	The cumulative development of 1,817 homes planned for Nailsea is disproportionate for the size of the town and it will put unacceptable pressure on current public facilities and services. There is no investment plan to deal with the inevitable population increase and the impact it would have on service provision. **(A Burgess, E Morrison, Ian Bloom, Peter Jennings, R Burgess, W Morrison)**	The identification of Nailsea and Backwell as a strategic location is justified and in accordance with the spatial strategy. The selection of sites, and how they accord with that strategy is set out in the Spatial Strategy, Site Selection and Capacity Paper. New infrastructure provision is detailed in the Infrastructure Delivery Plan.
		No locations or funding for the three primary schools identified as necessary for Nailsea and Backwell have been specified yet. **(Ian Bloom, Peter Jennings, W Morrison)**	A specific location is identified for one of the schools within the consented Grove Farm scheme. The other two are identified for the East of Backwell, and South of Nailsea allocations, with precise boundaries to be confirmed through masterplanning. Funding for the schools is required via planning obligations as detailed in the IDP.
		Valuable wildlife habitats of the Moorend Spout Nature Reserve and the Land Yeo/Tickenham Moor river valley will be harmed if this land is developed, resulting in a loss	The Local Plan is supported by a Habitats Regulations Assessment which did identify potential areas of high suitability for SAC



		to biodiversity and pollution of the river. The site is immediately adjacent to the Moorend Spout Nature Reserve and is surrounded by sensitive landscapes and heritage assets such as Tyntesfield, Cadbury Camp, and Tickenham Moor SSSI which will be negatively impacted by development. Greater and Lesser Horseshoe Bats (protected species) use this site and will lose their foraging ground if it is developed. It is an important and irreplaceable wildlife corridor for birds and mammals. **(A Burgess, Diane Snape, E Morrison, Ian Bloom, Margot Held, Peter Jennings, R Burgess, S Johnson, Susie Bevan, Tickenham Parish Council, W Morrison)**	bats, and moderate connectivity to known roosts in the area. Additional ecological investigation will be required at the planning application stage.
		The railway station has poor accessibility for disabled people and will not be able to accommodate the rise in passenger numbers from development in the town, increasing car dependency. The current rail network already struggles to support the capacity required at rush hour, and such an increase would leave the service heavily overcrowded. **(A Burgess, C Cox, E Morrison, Ian Bloom, Peter Jennings, R Burgess, W Morrison)**	This issue is noted, and the Local Plan seeks improvements to accessibility. Furthermore, a proposed modification allows for potential relocation subject to feasibility. This scheme is also listed in the IDP.
		Development would result in increased traffic issues,	The local plan and its proposed development



		especially on the rural road network around the town. This will mean safety issues for vulnerable road users – pedestrians, cyclists and horseriders. Current road network (particularly the B3130 and B3128) is at capacity and there would be significant congestion problems from more housing. It has been suggested that a north Nailsea link road should be built to alleviate traffic issues between Clevedon Road and the B3130 serving the development sites to the north and west of the town and alleviating congestion in the Town Centre. Tickenham Parish Council have suggested the construction of a road link between Nailsea and Clevedon between the M5 and south-west Nailsea to alleviate traffic from the development proposed around Nailsea and Backwell. **(A Burgess, C Cox, Diane Snape, E Morrison, Ian Bloom, John Payne, Peter Jennings, R Burgess, Susie Bevan, Tickenham Parish Council)**	allocations have been subject to transport assessment to identify any adverse impacts upon the local road network. This has led to the proposed mitigations in the local plan to support growth. A north Nailsea link road was considered and ruled out. The Transport Assessment Appendix E is the Nailsea and Backwell Transport Strategy and this provides the preferred package of transport mitigation required to address the cumulative impact of proposed developments. This document sets out the background to improvements around the rural lanes and the Cross Rail Link mitigation scheme. These mitigations are translated into the Infrastructure Delivery Plan.
		Government policy states that we should protect good quality agricultural land for food production and these proposals contradict this policy. **(C Cox, Diane Snape, E Morrison, Ian Bloom, Nailsea Action Group, Peter Jennings)**	The NPPF does not preclude development on best and most versatile land and this is one of a range of factors that have been taken into account in deciding the proposed allocations. This is addressed further in the Best and Most Versatile Land Background Paper.



		There is a lack of employment opportunities in the area resulting in outward commuting. **(Diane Snape)**	Additional employment land is proposed within the Nailsea and Backwell strategic development location to address this.
		Greenfield Crescent Playing Field is not protected under Local Green Space Policy LP15. **(Ian Bloom)**	The current planning application for this site seeks to retain playing pitches in this location. Any loss of pitches would need to be addressed, with equivalent replacement.
		The merging of Nailsea and Tickenham will happen if this development in the Green Belt is allowed to happen. **(Tickenham Parish Council, W Morrison)**	Whilst this site is being released from the Green Belt, Green Belt will be retained between Nailsea and Tickenham.
		The Land Yeo (Main River) has flooding issues around Jacklands Bridge near Stone-Edge-Badge. The proposed developments at Land North of Nailsea and Land of Pound Lane needs to consider this issue and not increase flood risk. Additionally, access routes for Environment Agency maintenance could be affected and will need further consideration. **(Environment Agency)**	The Local Plan is supported by a SFRA Level 1 and Level 2 document that provides an evidence base as to the current and future flood constraints across North Somerset. The proposed allocations have been considered through the SFRA to identify the extent of flooding affecting them. The site is not indicated to be at extensive flood risk that cannot be mitigated, however site-specific flood risk assessment would be required at



			planning applications stage that should provide further detail.
		Historic England request additional mitigations to address any potential harm to local heritage assets be listed as site specific requirements. **(Historic England)**	Noted. A proposed change is suggested to address this, which has been agreed in a Statement of Common Ground between the council and Historic England.
		The developer supports the allocation but makes requests for wording changes to site specific requirements, in respect of drainage attenuation, heritage assets and maintaining rural views. **(Bloor Homes)**	Support noted. The council is satisfied that the site-specific requirements listed are appropriate, justified and suitably flexible.
		The developer anticipates that contributions required to schemes identified in the Nailsea and Backwell Transport Strategy will be appropriately calculated and methodology shared. **(Bloor Homes)**	This is set out within the Nailsea and Backwell Transport Strategy and the IDP.
Poplar Farm, Nailsea	24	Existing road access to and from Nailsea is already constrained, with many routes narrow, poorly maintained, and unsuitable for increased traffic. The proposed development will produce additional traffic onto the B3130	The Local Plan and its proposed development allocations have been subject to transport assessment to identify any adverse impacts upon the local road network. This



		and B3128. The scale of development would significantly increase traffic levels, leading to congestion on existing roads and rural lanes. The site is surrounded by narrow country lanes with a lack of pavements. Increased vehicle movements would reduce safety for pedestrians, cyclists, and horse riders. The Local Plan's proposed new road infrastructure is considered inadequate and undeliverable on cost and engineering grounds, particularly the cross rail link road. The site is poorly served by public transport, with the nearest bus stop around 0.7 miles away and the railway station significantly further, reducing the likelihood of new residents opting for public transport/active travel over private cars. Public transport provision is currently insufficient in terms of reliability, frequency, accessibility, and coverage. Insufficient pavements and unsuitable footpaths make walking or wheelchair use dangerous given the additional traffic from this site and existing additional sites in the surrounding area. Concerns that access to the site is inadequate. **(A Burgess, Diane Snape, Geoffrey Connock, Ian Bloom, John Ricketts, Karen Bird, L Harrisis, Lesley Connock, Margot Held, Michael Rose, Misha Herwin, Nailsea Action Group, R Burgess, Tickenham Parish Council, W Morrison, E Morrison)**	has led to the proposed mitigations in the Local Plan to support this cumulative package of growth. The Transport Assessment Appendix E is the Nailsea and Backwell Transport Mitigations Strategy and this provides a package of transport mitigation required to address the cumulative impact of proposed developments in the area. This includes mitigations around the rural lanes, as well as active travel and public transport improvements, and a strategic new highway scheme to link Nailsea and Backwell and alleviate current congestion issues. Site-specific access arrangements will be addressed through a planning application.

		The cumulative development of 1,817 homes planned for Nailsea is seen as overdevelopment, and it will put unacceptable pressure on current public facilities and services such as health, leisure and education facilities. There is no investment plan to deal with the inevitable population increase and the impact it would have on service provision. Existing primary schools are at capacity, and no locations have been identified for new schools. **(A Burgess, Geoffrey Connock, Ian Bloom, Karen Bird, L Harrisis, Lesley Connock, Margot Held, Misha Herwin, Nailsea Action Group, R Burgess, W Morrison, E Morrison)**	The identification of Nailsea and Backwell as a strategic location is justified and in accordance with the spatial strategy. The selection of sites, and how they accord with that strategy is set out in the Spatial Strategy, Site Selection and Capacity Paper. New infrastructure provision is detailed in the Infrastructure Delivery Plan, and three new primary schools are required around Nailsea and Backwell to accommodate the anticipated number of new pupils that will arise.
		Wildlife habitats, including bat conservation areas and green corridors, would be adversely affected by the scheme. Protected bat species, notably Greater and Lesser Horseshoe bats, use this site and would lose foraging habitats. Poplar Farm is a functional linkage to the North Somerset and Mendip Bats SAC. The Habitat Regulations Assessment (HRA) produced by AECOM notes that Poplar Farm is functionally linked to North Somerset and Mendip Bats SAC and development has potential for adverse impact on the site. **(A Burgess, Geoffrey Connock, Ian Bloom, John**	The Local Plan is supported by a Habitats Regulations Assessment which concluded that the allocation is primarily of moderate suitability for SAC bats. Additional ecological investigation will be required at the planning application stage.



		Ricketts, L Harrisis, Lesley Connock, Margot Held, Misha Herwin, Nailsea Action Group, R Burgess, Susie Bevan)	
		Development is planned on land which is prone to consistent flooding. Part of the site lies within Flood Zone 3. Replacing permeable land with hard surfaces may increase surface water runoff, raising the potential for localised flooding both on-site and downstream, especially during heavy rainfall. Concerns raised about drainage for water/sewage to the new properties and the impact this will having on surrounding properties. It is said that the current system is overloaded and there are existing problems which Wessex Water have had to resolve. **(Karen Bird, L Harrisis, Margot Held, Misha Herwin, Nailsea Action Group, Susie Bevan, John Ricketts)**	The Local Plan is supported by a SFRA Level 1 and Level 2 document that provides an evidence base as to the current and future flood constraints across North Somerset. The proposed allocations have been considered through the SFRA to identify the extent of flooding affecting them. The site is not indicated to be at extensive flood risk however site-specific flood risk assessment would be required at planning applications stage that should provide further detail. In line with PPG, where surface water flooding is an issue the priority is to ensure the development can be made safe for its lifetime and to avoid vulnerable development on more constrained parts of the site through effective masterplanning. In respect of drainage, developers are required to pay connection charges to utilities providers and any required upgrades would be identified and delivered by those providers to ensure sufficient capacity to accommodate new

			connections/ demands.
		Object to the loss of Green Belt land. **(A Burgess, Karen Bird, R Burgess, W Morrison, E Morrison)**	This site is not in the Green Belt.
		Nailsea and Backwell railway station is not considered capable of accommodating the expected increase in passenger numbers from proposed developments in the town. Poplar Farm is also too far from the station for walking and cycling to be practical. Existing platforms are narrow and short, with inadequate accessibility, particularly for mobility vehicles and pushchairs. It is unsuitable for expansion into a transport hub due to limited space, poor accessibility, and inadequate facilities. It requires significant investment, including step-free access, extended platforms, lifts, ramps, shelters, and improved facilities for families and disabled users. A relocation would potentially solve these issues. **(A Burgess, Diane Snape, Geoffrey Connock, Ian Bloom, R Burgess)**	The plan seeks to facilitate improvements to the station, to address the accessibility concerns in particular. A proposed change is recommended, to include the possibility of potential future relocation subject to feasibility.
		It has been suggested that a north Nailsea link road should be provided to reduce congestion in Backwell,	Alternative transport mitigations were considered through the Transport



		improving emergency access, avoiding green belt impacts, and maintaining separate identities of the two settlements of Nailsea and Backwell. Alternatively, Tickenham Parish Council suggest the construction of an enhanced road link between Nailsea and Clevedon. **(Diane Snape, Tickenham Parish Council)**	Assessment prepared to support the plan, but discounted.
		The plan would result in the permanent loss of productive Grade 2 agricultural land, undermining food security and local farming, while failing to value agricultural heritage. **(Geoffrey Connock, Ian Bloom, John Ricketts, Susie Bevan, W Morrison, E Morrison)**	The NPPF does not preclude development on best and most versatile land and this is one of a range of factors that have been taken into account in deciding the proposed allocations. This is addressed further in the Best and Most Versatile Land Background Paper.
		Support the allocation in principle, but objection to the specific policy wording, particularly the requirement for undefined “proportionate” transport contributions, arguing it should be limited to clearly identified and schemes *relevant* to Poplar Farm to comply with CIL Regulation 122. **(Crest Nicholson Operations Ltd)**	Support noted. Proposals are set out within the Nailsea and Backwell Transport Strategy, the IDP, and underpinned by policies within the Local Plan particularly Policy LP3 and DP63. It will be demonstrated that any contributions requested through a planning application meet the CIL tests.



Land south of Nailsea	90	Strong concern that proposed growth (around 1,800 homes in Nailsea and 1,000+ in Backwell) is excessive and disproportionate to the size of the current town and village. It is considered to be overdevelopment for the area. Respondents argue this would result in population increases of around 55% in Nailsea and up to 80% in Backwell. Repeated comparisons are drawn with Clevedon (around 2% growth) and Portishead/Pill (around 14%), leading to perceptions that growth is not fairly distributed. There is a fear that this scale of growth would fundamentally change the character of both settlements and lead to their coalescence between Nailsea and Backwell, eroding the strategic gap between them. Suggestion made to concentrate growth closer to Ashton Vale which is strategically close to employment opportunities. **(A Burgess, A Howell, A Morris, B Harland, B Lawrence, Barry Moss, C Attwood, Carl Bax, Cath Bees, Charlie Crooks, Christopher Dunford, Dan Sweet, E Morrison, Eileen Bax, H.I.Walton, Ian Bloom, Jeanne Craske, Jo Cox, Joe Tallis-Chisnall, Jonathan Wells, K Snook, Karen Bird, Kate Enright, Liz Gritten, Lynne Cooper, Marian Donovan, Michael Craske, Nailsea Action Group, Nancy Morgan, Natalie Jennings, Oriel Wright, Paul N, Peter Jennings,**	Nailsea and Backwell is identified as a Strategic Location and a focus for growth in line with the plan's spatial strategy. This is further explained in the Spatial Strategy, Site Selection and Capacity Paper. It should be noted that significant growth is already directed to the Woodspring Strategic Location at the South West of Bristol. There is a proposed extension of the Green Belt between Nailsea and Backwell to address the concerns of coalescence, in place of the strategic gap designated in the adopted development plan. •

		Priscille Lesne, R Burgess, R Crabtree, R Snook, RiSC - Residents in Station Close Backwell, Roger Crook, S Ashworth, S Lane, Stellan Jara, Vicky Moss, W Morrison)	
		There is a widespread view that existing public services and infrastructure (healthcare, schools, leisure, utilities) are already overstretched and the level of development proposed will mean services cannot cope with increased demand. There has already been significant housing growth in the area and despite this no new leisure or community facilities have been provided. The community are concerned that there is no certainty over funding, locations, or timings to deliver important new services such as new schools or doctor's surgeries. Funding and delivery arrangements for new community infrastructure, including health and education facilities, is requested to demonstrate how they will be able to accommodate additional demand. **(A Burgess, A Morris, A Ribbon-Miles, Alison Jones-Moran, Anita Golding, B Harland, B Lawrence, Barry Moss, C Attwood, Cath Bees, Christopher Dunford, Dan Sweet, E Morrison, George Ricks, H.I.Walton, Ian Bloom, Jeanne Craske, Jo Cox, Joe Tallis-Chisnall, Jonathan Wells, K Collier, K Snook, Karen Bird, Kate**	The Local Plan and accompanying Infrastructure Delivery Plan identify the infrastructure required to support the growth proposed around Nailsea, including education and leisure provision. Proportionate contributions will also be sought for other infrastructure where this is necessary and justified.

		Enright, Katie Gore, Liz Gritten, Lynne Cooper, M Davis, Margot Held, Michael Craske, Nancy Morgan, Natalie Jennings, Peter Baker, Peter Jennings, R Crabtree, R Eade, R Ransome, R Snook, RiSC - Residents in Station Close Backwell, Roger Crook, S Ashworth, S Lane, Simon Russell, Stellan Jara, Susie Bevan, Vicky Moss)	
		There are concerns about what impact the scale of development will have on the local road network and how this will worsen existing traffic issues and congestion. Nailsea is not directly connected to any major A-trunk roads and is only served by single carriageway B-roads. The A370 between Backwell and Long Ashton is said to be particularly congested at peak hours. There is likely to be an unsustainable increase in traffic in the local area. Rural lanes also have problems with rat running during commuting times. Respondents would like more details on the proposals for Rural “Quiet Lanes” in this area and other details about how additional traffic can be mitigated. Concerns that the B3130 (Clevedon Road/Tickenham Road) and B3128 (Tickenham Hill/Clevedon Road) do not have capacity for accommodating any additional traffic which will be generated from new development around Nailsea which may use this road to access the M5 at Clevedon. NSC has placed a lot of emphasis on Active	The Local Plan and its proposed development allocations have been subject to robust transport assessment to identify any adverse impacts upon the local road network. This has led to the proposed mitigations in the local plan to support the growth proposed. The Transport Assessment Appendix E is the Nailsea and Backwell Transport Mitigations Strategy and this provides a package of transport mitigation required to address the cumulative impact of proposed developments in the area. This document sets out the background to the mitigation schemes proposed. These mitigations are translated into the Infrastructure Delivery Plan.

		Travel (walking, cycling, horse riding) however many development sites are too far from the town of village centre to make walking a viable solution. Claims the data modelling for traffic is flawed due to unrealistic assumptions. The site requires a public transport capacity study to assess rail and bus provision and a plan to improve public transport links to the site, in coordination with the Nailsea and Backwell Transport Strategy. **(A Burgess, A Morris, A Ribbon-Miles, Alan Raines, Anita Golding, B Lawrence, Barry Moss, Bob Beale, C Attwood, C Cox, Carl Bax, Christopher Dunford, David Threlfall, Eileen Bax, Frances Russell, Gail Scott-Wilson, George Ricks, Gerry Scott-Wilson, H.I.Walton, Ian Bloom, Jeanne Craske, Jessica King, Joe Tallis-Chisnall, John Speight, Jonathan Wells, K Collier, K Riches, K Snook, Karen Bird, Katie Gore, Liz Gritten, Lynne Cooper, Lynne Cooper, M Barmes, M Davis, M Lynch, Margot Held, Marian Donovan, Michael Craske, Nailsea Action Group, Nancy Morgan, Natalie Jennings, Paul N, Peter Baker, R Crabtree, R Eade, R Ransome, R Snook, Rachel Cox, RiSC - Residents in Station Close Backwell, Roger Crook, S Ashworth, S Lane, Simon Russell, Stellan Jara, Susie Bevan, Tickenham Parish Council - John Banks, Tickenham resident, Trevor George Essex, Vicky Moss)**	

		The proposed cross-rail link road outlined in the Infrastructure Delivery Plan (IDP) is perceived to be too expensive to construct as it would cross land that regularly floods beside the River Kenn and would require an under or over-rail crossing, which is perceived to be too complex and expensive to be feasible. As there is no confirmed funding, it is unclear who would deliver the scheme. There is concern that it would not be built early enough to mitigate impacts of new housing. **(A Burgess, A Morris, Alan Raines, Alison Jones-Moran, B Harland, B Lawrence, C Cox, Carl Bax, Cath Bees, Christopher Dunford, Dan Sweet, Diane Snape, E Morrison, E Morrison, Eileen Bax, J Eade, Jo Cox, John Speight, K Collier, K Snook, Kate Enright, Liz Gritten, Lorraine H-P, Lynne Cooper, M Davis, M Lynch, Natalie Jennings, Oriel Wright, Peter Jennings, R Burgess, R Snook, Rachel Cox, RiSC - Residents in Station Close Backwell, Roger Crook, S Ashworth, Stellan Jara, Tim Harland, Trevor George Essex, W Morrison)**	All developments in the Nailsea and Backwell strategic location will be expected to make proportionate contributions to this strategic mitigation, for which a business case is being prepared. Other sources of funding, in addition to the development contributions, are being explored. It is considered that the impacts of the proposed scheme can be mitigated and are considered reduced compared to a previous scheme of bridging over the railway.
		Many objections challenge the assumption that Nailsea & Backwell Station can function as a transport hub. There are concerns about the short, narrow platforms that cannot safely accommodate more passengers; a lack of	The plan makes provision for improving accessibility at Nailsea and Backwell Station. A proposed change is also recommended to consider relocation of the station if this is a



		step-free access for disabled people, parents with prams, and elderly passengers; peak-time services already being overcrowded or unreliable and a lack of car parking/cycling facilities to encourage active travel. Many rail services do not stop at the station. The walking and cycling route along Station Road is dangerous due to narrow and incomplete pavements and it is also quite far from the town centre of Nailsea and village centre of Backwell to mean active travel is practical. **(A Burgess, A Ribbon-Miles, B Harland, B Lawrence, C Attwood, C Cox, Carl Bax, Dan Sweet, E Morrison, Edwards family, Frances Russell, Ian Bloom, K Snook, Lynne Cooper, Michael Craske, Natalie Jennings, Peter Jennings, R Burgess, R Eade, R Ransome, RiSC - Residents in Station Close Backwell, Roger Crook, S Lane, Stellan Jara, Tim Harland, W Morrison)**	feasible longer-term prospect.
		Respondents have highlighted that Backwell Lake (Reservoir) and Backwell Common flood function as a natural balancing pond. Building in this area and therefore increasing impermeable surfaces and water run-off will exacerbate existing issues. Concerns raised that any new homes would be susceptible to flooding. Station Road and Chapel Hill are said to be frequently impassable after	The local plan is supported by a SFRA Level 1 and Level 2 document that provides an evidence base as to the current and future flood constraints across North Somerset. The proposed allocations have been considered through the SFRA to identify the extent of flooding affecting them. Site-specific flood



		heavy rainfall and it is argued that new development would likely increase flooding risk for surrounding roads, residential properties and rail infrastructure. Plans should provide robust flood risk, sequential test, and drainage assessments, showing how surface water, sewer capacity, and SuDS measures will manage risk both on and off site for existing and future residents. **(A Burgess, A Howell, A Ribbon-Miles, Alison Jones-Moran, Anita Golding, B Harland, B Paige, Barry Moss, C Cox, Charlie Crooks, Christopher Dunford, Dan Sweet, Diane Snape, Edwards family, H Power, Ian Bloom, Jeanne Craske, Jessica King, Joe Tallis-Chisnall, John Speight, K Riches, K Snook, Karen Bird, Kate Enright, Katie Gore, Liz Gritten, Lynne Cooper, Marian Donovan, Michael Craske, Natalie Jennings, Paul N, Peter Jennings, Priscille Lesne, R Burgess, R Crabtree, R Eade, R Snook, Rachel Cox, RiSC - Residents in Station Close Backwell, Roger Crook, S Ashworth, S Lane, Simon Russell, Stellan Jara, Susie Bevan, Tim Harland, Zehra Tahtakilic)**	risk assessments are required as part of planning applications, that should investigate flood risk issues in greater detail, including the potential for increasing flood risk elsewhere. Officers have engaged with Backwell Parish Council on flood risk matters and are considering the issues further via additional modelling to provide a consistent basis for planning applications.
		Green Belt release is viewed as unjustified and the evidence provided does not meet the NPPF's criteria for 'exceptional circumstances' for Green Belt release. Requests from residents to reassess alternative sites.	This site is not in the Green Belt.



		(A Burgess, Dan Sweet, David Threlfall, E Morrison, Eileen Bax, Frances Russell, H.I.Walton, Joe Tallis-Chisnall, John Speight, Karen Bird, Kate Enright, Liz Gritten, Lynne Cooper, Nailsea Action Group, Peter Baker, Priscille Lesne, R Burgess, S Ashworth, Simon Russell, Stellan Jara, Trevor George Essex, W Morrison)	
		Concern regarding the loss of Best and Most Versatile Agricultural Land. **(A Burgess, A Howell, A Morris, Anita Golding, B Lawrence, C Cox, Carl Bax, Cath Bees, Dan Sweet, Diane Snape, E Morrison, Eileen Bax, Ian Bloom, Jonathan Wells, K Collier, K Snook, Kate Enright, Lynne Cooper, Margot Held, Nailsea Action Group, Nancy Morgan, Natalie Jennings, Oriel Wright, Peter Jennings, R Burgess, R Eade, R Snook, RiSC - Residents in Station Close Backwell, S Ashworth, S Lane, Stellan Jara, Susie Bevan, Trevor George Essex, Vicky Moss)**	The NPPF does not preclude development on best and most versatile land and this is one of a range of factors that have been taken into account in deciding the proposed allocations. This is addressed further in the Best and Most Versatile Land Background Paper.
		Comments regarding the mix and type of dwellings that may be suitable in this location. **(Dan Sweet, Diane Snape, John Speight, Vicky Moss)**	This is a matter to be determined through a planning application.

		Comments that access to the development should be located off The Perrings, and other concerns with this approach. Amendment requested by Persimmon Homes to remodel the junction of Youngwood Lane and The Perrings. **(K Riches, Persimmon Homes)**	The Local Plan provides flexibility in this respect. The precise access arrangements will be determined through the required masterplan, and then subsequently planning applications.
		The allocation is an appropriate location for strategic housing growth as it forms a logical and integrated extension of the Netherton Wood Lane proposals further west and the existing residential form at The Perrings, Sedgemoor Close and Paddock Rise, with their associated infrastructure. **(Stephanie Fowler - Pegasus Group)**	Noted.
Grove Farm, Backwell	26	Objection is made to the inclusion of the parcel of land adjacent to West Leigh Primary School within this allocation. This land is owned by the Council. It should be removed from the allocation and designated as Local Green Space for educational and recreational use. **(Backwell Parish Council, Nailsea Town Council, Flax Bourton Parish Council, Brockley Parish Council, Backwell Residents Association, Nailsea Action**	It is not proposed to remove this land from allocation in the plan. Whilst there are no confirmed proposals for this part of the site at this time, it is considered beneficial to include it in the plan to provide some additional potential residential capacity, although noting that other uses may be considered appropriate in future.



		Group, Councillor Bridget Petty, Louise Chapman)	
		Concern is also raised that, although a new primary school is required, the Council has not secured funding contributions for its delivery. **(Backwell Parish Council, Nailsea Town Council, Flax Bourton Parish Council, Brockley Parish Council, Backwell Residents Association, Nailsea Action Group)**	Funding mechanisms to deliver required infrastructure is addressed in the IDP.
		Concerns have been raised about existing transport capacity and congestion on roads including the A370, Station Road, Backwell Crossroads and rural lanes in and around Backwell and Brockley. There are claims that at present the bus and rail services are inadequate to support the proposed large population increase. **(Brockley Parish Council, C Stone, Christopher Watkins, Debra Britton, Debra Britton, J Farr, Justin Mohan, Mrs Julie Goldbert, Mrs Wendy Derrick, O Cullen, T Madge, Thomas Jackson, Tim Baines, Tom Curtis)**	Noting that this site already has consent and a number of mitigations have been secured through the S106 agreement, the Transport Assessment has modelled and considered cumulative impacts of all of the developments identified in the Local Plan. Appendix E to the Transport Assessment is the Nailsea and Backwell Transport Strategy. This has considered the transport issues holistically in and around Nailsea and Backwell and identified a package of mitigations. These are then allocated in the plan and captured in the IDP.
		Backwell is designated as a ‘Service Village’, yet	The Service Village status is identified under



		proposed growth is disproportionate to its size and infrastructure. The Plan fails to show that the use of brownfield land and regeneration opportunities have been maximised in Weston-super-Mare, Clevedon, Nailsea or Portishead. Brownfield land or low-yield agricultural land, close to existing large conurbations, should be prioritised. **(Brockley Parish Council, C Stone, Dan Wilmott, Debra Britton, J Farr, Justin Mohan, Mrs Julie Goldbert, Mrs Wendy Derrick, T Madge, Thomas Jackson)**	the current Core Strategy. The new local plan does not carry through these same settlement designations, and the Spatial Strategy, Site Selection and Capacity paper sets out the approach to identifying strategic locations for growth.
		Growth earmarked for Backwell will require significant upgrades to public services and facilities to provide the educational, leisure, health and recreational facilities required. It is felt that the Plan does not clearly set out what public services and infrastructure are required, how they will be funded, or when they will be delivered. **(Brockley Parish Council, C Stone, Christopher Watkins, Debra Britton, H Power, J Farr, Mrs Julie Goldbert, Mrs Wendy Derrick, O Cullen, T Madge, Thomas Jackson, Tim Baines, Trevor Watts)**	The plan, together with the Infrastructure Delivery Plan provide for a range of infrastructure upgrades. A proposed change is recommended to Policy LP3 to address the phasing concerns, adding the following wording. *'Policy LP3 requires a phasing strategy to be provided with planning applications so applicants can demonstrate a credible strategy for delivery of the required infrastructure identified to support development. This is required to align to the infrastructure details within*

			the Infrastructure Delivery Plan (IDP). The IDP identifies the relevant infrastructure schemes applicable to the Nailsea and Backwell Strategic Location to which development proposals should positively contribute'.
		This site incorporates Grade 1 agricultural land currently used for food production. Building on this contradicts government policy to protect this land. **(C Stone, Christopher Watkins, Debra Britton, H Power, J Farr, Justin Mohan, Mrs Julie Goldbert, Mrs Wendy Derrick, O Cullen, T Madge, Thomas Jackson, Tom Curtis, Trevor Watts)**	The NPPF does not preclude development on best and most versatile land and this is one of a range of factors that have been taken into account in deciding the proposed allocations (and in respect of this particular site considered through the planning application process). According to the most recent mapping from DEFRA this land is Grade 2. This is addressed further in the Best and Most Versatile Land Background Paper.
		There are no job opportunities in Backwell, so new residents will have to commute out of the village to find work. Housing growth should be located closer to existing employment sites and existing infrastructure. **(Mrs Julie Goldbert, Mrs Wendy Derrick, Thomas Jackson)**	The local plan proposes new employment development alongside housing to support sustainable development and offer additional opportunities for local employment and business activity; however some out-commuting is expected to remain. The local plan therefore also includes wider initiatives

			seek to improve public transport connections into Bristol to facilitate sustainable travel. The proposed employment land is located close to the train station and A370 offering potential for a commercially attractive opportunity.
		The developer acknowledges that the capacity figure stated in schedule 1 of the Plan correlates with the figure in the Outline Planning Permission for the site. They believe that this number will allow an efficient layout of the site with significant amounts of public open space, strategic landscaping, ecological mitigation, sustainable drainage and supporting infrastructure. **(Taylor Wimpey - Land at Grove Farm and Burnt House Farm, Backwell)**	Noted.
		Financial contributions towards infrastructure required, including (but not limited to) highways, education and community facilities should be subject to a minimum threshold of contribution that represents real community value to the area. **(David Threlfall)**	This particular site has outline planning consent and a legal agreement already in place.
		Backwell Common and surrounding areas are prone to	This site has planning consent, and these

		flooding which will be aggravated by more housing. (**Debra Britton, Justin Mohan, Mrs Julie Goldbert, T Madge)**	issues were addressed through the planning application process.
		Concerns about whether the affordable housing requirement will be financially viable and whether the developers will deliver it. **(Justin Mohan, Guy Stone, Tom Curtis)**	This site has planning consent, and these issues were addressed through the planning application process.
		Concerns raised about the access to the site and how this will impact surrounding roads. **(Louise Chapman)**	This site has planning consent, and these issues were addressed through the planning application process.
		The plan should make reference to the impact of this development on the nearby Grant Mills Footpath Level Crossing. **(Network Rail)**	This site has planning consent, and these issues were addressed through the planning application process.
		Backwell represents one of the most appropriate and sustainable locations for delivering housing growth as it is well connected by road, rail and bus, sits on low-sensitivity agricultural land, and can deliver strategic infrastructure such as the Cross Rail Link, active travel routes, schools	Noted.



		and employment land. These sites are less environmentally harmful in comparison to other allocations in the plan. **(Tom Henley)**	
Land at Farleigh Farm, Backwell	3	It is felt that the development proposed in Backwell is disproportionate for the size of the village and that there are insufficient facilities and services to support this level of development. There are also limited public transport options in the village, so it is not considered to be a 'sustainable' location. School provision, medical services , shops, will not be able to support increased demand. Various comments are made on this site about the loss of green fields, impact on character, increased traffic that may be generated. **(G Rich, J Farr, Guy Stone)**	We note the concerns around the scale of development around Backwell and have responded to this in our comments under Policy LP3: Nailsea and Backwell. This particular site has planning permission and is under construction.
		Concern that this proposal will not provide any affordable homes for local people. **(Guy Stone)**	This site has planning permission and is under construction. It will deliver affordable housing in accordance with the consent and legal agreement that is in place.
Land west of Rodney Road,	9	Concerns about the proximity of this development to West Leigh Infant School and the proposal to build on the open	This site has planning permission and is under construction. The land referred to is a



Backwell		space east of West Leigh Primary School. **(Clement Elphick, E Bossanyi, H Bray, Jack Nicholls, Lucy MacDonald, Millie Huntley-Payne, Guy Stone, Owain Thatcher)**	part of the Grove Farm allocation, rather than this particular site, and this issue is addressed in our response to Policy LP3.
		Concerns that the access to the site is inadequate and that it should never have been allowed as the roads leading to the development are unsuitable for this volume of traffic. **(Louise Chapman)**	The concerns are noted, however the planning consent has been granted and the site is under construction.
		Concerns that the development will have a detrimental impact on open greenspace and local biodiversity. **(Guy Stone)**	The concerns are noted, however the planning consent has been granted and the site is under construction.
Dark Lane, Backwell	5	Concern raised about the lack of employment opportunities in Backwell which will result in new residents commuting out of the village for work. It is felt this is contrary to one of the key sustainability principles of the Local Plan, which aims to incorporate or locating housing close to employment opportunities. **(David Legg, Jim Harwood, Michael Rose)**	This particular site already has planning consent in place, but the Land East of Backwell allocation includes a requirement for that development to provide employment alongside housing.



		There is currently a lack of local facilities and services for the community's need and if this scale of housing is developed then these services will need to be upgraded as they struggle to meet existing demands. **(David Legg, Jim Harwood, Patrick Clements)**	This particular site already has planning consent in place, but the local plan and accompanying IDP do make provision for additional services and facilities and other infrastructure in and around Backwell as we agree this is necessary to support the level of growth proposed.
		Existing road system and proposed new roads are inadequate for the increase in population. Development in the area will result in higher levels of traffic on the roads and this will be particularly dangerous for schoolchildren around Backwell School. It is felt that the cross-rail link road proposed is unlikely to be deliverable due to high cost and engineering difficulties, and that it would not alleviate current traffic issues around Nailsea and Backwell. Without this road development in this area, new development would cause chaos on existing roads. Comments also made regarding the proposed access arrangements and pedestrian safety. **(David Legg, Jim Harwood, Michael Rose, Patrick Clements, Guy Stone)**	This particular site already has planning consent in place, which includes localised mitigations and measures to ensure that no road safety issues are caused from the development. The local plan and accompanying IDP make provision for the cross rail link road and other infrastructure in and around Backwell to ensure the impacts are mitigated. These are listed in both the plan itself and the IDP.
		The railway station is currently inaccessible for disabled	This is addressed in Policy LP3 which

		people and this needs to be addressed. **(David Legg)**	requires: *'Access improvements for Nailsea and Backwell railway station, to include increased provision for cycle parking, bus interchange facilities and car parking, and consideration of possible future station expansion'.* A proposed change is also recommended to include reference to potential relocation of the station if this is feasible in future.
		Concerns raised about whether ecology and flooding issues have been properly considered. New development is likely to exacerbate current issues. **(David Legg, Jim Harwood, Guy Stone)**	This site has planning consent, and these matters were considered through the application process.
		The fields are high grade agricultural land and should be preserved for this use. **(David Legg, Patrick Clements)**	This site has planning consent, and these matters were considered through the application process.
Land east of Backwell	550	Significant local opposition to this proposed allocation from local residents. Responses from respondents are largely seeking the allocation to be removed from the plan. The main themes raised throughout the	The scale of objection to this allocation is noted and understood. We have responded to the key themes raised in the objections below.



		representations are listed individually below. **(Note that names of individual respondents have not been listed given the number of objections to this particular allocation. Respondent names, along with the full content of each representation, are listed in the schedules of respondents or available to view on our consultation system)**	
		Local concerns regarding surface water flood risk, both on the site itself and across Backwell as a whole. Residents provide accounts of regular flood events, and express concerns around run off. Concerns are raised that development of this site will increase flood risk elsewhere in the village. Other concerns are raised around climate change resilience and surface water management, particularly given increasing rainfall intensity.	The local plan is supported by a SFRA Level 1 and Level 2 document that provides an evidence base as to the current and future flood constraints across North Somerset. The proposed allocation has been considered through the SFRA to identify the extent of flooding affecting them. The site is not indicated to be at extensive flood risk however site-specific flood risk assessment would be required at planning applications stage that should provide further detail. In line with PPG, where surface water fooding is an issue the priority is to ensure the development can be made safe for its lifetime and to avoid vulnerable development on more constrained parts of the site through



			effective masterplanning. • Officers have engaged with Backwell Parish Council on flood risk matters and are considering the issues further via additional modelling to provide a consistent basis for planning applications.
		Very strong objections to the loss of best and most versatile agricultural land, noting that only a small proportion remains in Backwell and across North Somerset as a whole, and that any development of this site would conflict with national policy intentions around food security.	NPPF does not preclude development on best and most versatile land and this is one of a range of factors that have been taken into account in deciding the proposed allocations. The loss of agricultural land is addressed in the best and most versatile agricultural land background paper, and covered further in responses to Policy DP53.
		Significant levels of concern from local residents regarding the existing road network, citing traffic congestion, impacts of additional growth on local rural roads and rat running. Other particular areas of concern include congestion and matters of road safety on the A370, Station Road, Backwell Crossroads, Backwell Common and Chapel Hill. Impacts during peak periods are of most concern, and	The local plan and its proposed development allocations have been subject to transport assessment to identify any adverse impacts upon the local road network. This has led to the proposed mitigations in the local plan to support growth. •



		references are made to periods of motorway closure adding additional traffic to an already overstretched network. Many respondents raise concerns regarding the proposed package of mitigations and in particular are sceptical over the Cross Rail Link road and whether this is the viable and deliverable. There are doubts over whether this is the most appropriate scheme to deliver meaningful relief from the congestion already experienced.	The Transport Assessment Appendix E is the Nailsea and Backwell Transport Strategy and this provides a package of transport mitigation required to address the cumulative impact of proposed development. This document sets out the background to the Cross Rail Link mitigation scheme and additional work is underway to develop the business case for it. These mitigations are translated into the Infrastructure Delivery Plan.
		Significant levels of concern from local residents regarding the existing road network, citing traffic congestion, impacts of additional growth on local rural roads and rat running. Other particular areas of concern include congestion and matters of road safety on the A370, Station Road, Backwell Crossroads, Backwell Common and Chapel Hill. Impacts during peak periods are of most concern, and references are made to periods of motorway closure adding additional traffic to an already overstretched network. Many respondents raise concerns regarding the proposed package of mitigations and in particular are	The local plan and its proposed development allocations have been subject to transport assessment to identify any adverse impacts upon the local road network. This has led to the proposed mitigations in the local plan to support growth. • The Transport Assessment Appendix E is the Nailsea and Backwell Transport Strategy and this provides a package of transport



		sceptical over the Cross Rail Link road and whether this is the viable and deliverable. There are doubts over whether this is the most appropriate scheme to deliver meaningful relief from the congestion already experienced.	mitigation required to address the cumulative impact of proposed development. This document sets out the background to the Cross Rail Link mitigation scheme and additional work is underway to develop the business case for it. These mitigations are translated into the Infrastructure Delivery Plan.
		References to inadequate employment opportunities in the village, which leads to out commuting which in turn exacerbates the already congested highway network and further growth will increase pollution and carbon emissions.	The site specific requirements for this allocation require the delivery of 5 hectares of employment land along with the proposed housing on this site.
		Concerns that existing infrastructure is already strained, with many references to education, leisure, transport, healthcare facilities and other uses, and views that the Infrastructure Delivery Plan lacks sufficient detail on costings, phasing and funding which means there is no certainty that the proposed infrastructure is capable of being delivered in a timely way to support the level of growth proposed. Many references are made to shortfalls	In the preparation of the local plan engagement has been carried out with various service providers to identify the implications of proposed development on service areas and the potential infrastructure requirements. This includes engagement with health services, education, and leisure services.



		in primary and secondary school places, as well as GP and dental services already being overstretched and residents are worried that housing will come forward without infrastructure being delivered first.	• The IDP sets out a range of infrastructure requirements accordingly alongside policy references in the local plan. These are costed schemes in the IDP and will require planning obligations and other funding sources to support their delivery.
		Scale of development proposed is disproportionate and represents overdevelopment which would adversely affect the character of the village, particularly in light of the previous developments already consented around the area. Concerns regarding the level of population growth that would result from all of the proposed developments, as it is felt that this is disproportionately excessive. Many respondents are concerned that the scale of growth proposed will alter Backwell's role and identity as a village. There are significant objections that Backwell is expected to accommodate a higher proportion of the local plan's identified growth, compared to other towns and villages and that this is not justified.	We note the concerns and are aware of the strength of feeling locally on this point. We would like to reassure residents that we are committed to ensuring that infrastructure is delivered as required, as well as measures to ensure key character features are retained and protected. The identification of Nailsea and Backwell as a strategic location is justified and in accordance with the spatial strategy. The selection of sites, and how they accord with that strategy is set out in the Spatial Strategy, Site Selection and Capacity Paper.
		Development will cause unacceptable adverse impacts	Implications of the proposed allocations have



		upon ecology and wildlife. Concerns around impact upon ecological networks, wildlife habitats and protected sites and species. Specific references to bat populations and the nearby maternity roosts.	been considered through the HRA produced by AECOM to support the Local Plan 2041. • On page 69 referring to the proposed East of Backwell site, the HRA reads, *"Given the suitability and connectivity of the allocation, there is the potential to have an adverse impact on functionally linked land for the SAC through removal or disturbance to valuable features.".* The HRA then provides guidance for appropriate mitigation: • *"Mitigation may be required which could include buffer zones around the boundary features and offsetting, to be submitted as a site mitigation plan prior to any application."*
		Objections raised to the loss of Green Belt, stating that the release of this site from the Green Belt has not been justified by exceptional circumstances.	Due to the increase in North Somersets housing requirement through the introduction of the mandatory standard method in the NPPF (Dec 2024) North Somerset cannot sustainably meet its housing requirement on sites outside the Green Belt. This constitutes



			exceptional circumstances and, in such instances, the NPPF directs local authorities to review their Green Belt boundaries and propose alterations to meet their housing need in full. As such North Somerset have undertaken a two stage Green Belt review and released land from the Green Belt for housing allocations.
		There are calls for the growth to be redirected to brownfield land first, towns, or locations with better existing infrastructure and employment opportunities.	The sequential approach to identifying sites is clearly set out in the Spatial Strategy, Site Selection and Capacity Paper. Existing commitments and brownfield sites are sequentially preferable, however in order to meet the housing requirement figure additional locations for growth are required.
		The proposals are in conflict with the made Backwell neighbourhood development plan.	The Backwell Neighbourhood Plan was prepared within the context of the previously adopted development plan documents, covering a time period up to 2026.
		Request for the boundary to be amended to include the independent southern access to the Rubix Land.	This is not considered necessary.



		(Rubix Strategic Limited)	
		The need for 5 hectares of employment on this site should be robustly justified, or deleted as a requirement. **(Mac Mic Strategic Land Backwell, Rubix Strategic Limited)**	The need for employment is robustly demonstrated in the evidence base documents and set out in Policy SP9: Employment. The location of employment allocations is supported by the spatial strategy in Policy SP3 and is explained in the employment land supply background paper. Locating employment growth along with new housing will address some of the concerns raised by residents regarding a lack of employment in Backwell currently, which leads to a pattern of out commuting.
		The need for a school to be provided within the allocation should be robustly justified. **(Mac Mic Strategic Land Backwell)**	The number of pupils that will be generated from a development of this scale requires additional primary school provision.
		Support the identification of the cross rail link road as a key infrastructure requirement, however note that the alignment as drafted extends beyond the control of the two parties who control the site. **(Rubix Strategic Limited)**	Noted. A proposed change is recommended to address this.

		Support the inclusion of this site for allocation. **(Mac Mic Strategic Land Backwell, Rubix Strategic Limited)**	Support noted.
Pill and Easton-in-Gordano			
Land at Lodway Farm	30	Concerns regarding the loss of Green Belt, and suggestions that previously developed sites have not been fully considered, or the density maximised on them. **(Alexander Nell, Pill and Easton-in-Gordano Parish Council, Julian Bowyer, Justin Saunders, Lisa Farrell, Luke Samuel Charles Evans, M Spencer, R Griffiths, Richard Clarke, Richard W,Spencer, Sustainable Pill & District, C Burnett Rae)**	Due to the increase in North Somerset's housing requirement through the introduction of the mandatory standard method in the NPPF (Dec 2024) North Somerset cannot sustainably meet its housing requirement on sites outside the Green Belt. This constitutes exceptional circumstances and, in such instances, the NPPF directs local authorities to review their Green Belt boundaries and propose alterations to meet their housing need in full. Deliverable previously developed sites have been considered first, as detailed in the Spatial Strategy and Capacity paper.
		Concern that there has been no assessment on the impact to agricultural land. They say this land has a Grade 1/2 DEFRA classification and the NPPF states that lower grade agricultural land options should be exhausted first	All the proposed allocations at Pill and Easton-in-Gordano are classified as 3b on the DEFRA agricultural land classification map. This means they do not constitute Best

		before higher grade land is considered for development. **(Pill and Easton-in-Gordano Parish Council)**	and Most versatile Agricultural Land.
		Many residents are concerned about the impact of traffic from the development on the surrounding road network, including J19 of the M5, the A369 and other local roads. They feel that transport issues associated with cumulative development in the area have not been fully considered. Air pollution arising from increased vehicle movements is also referred to, as well as current bus services and associated infrastructure being insufficient to accommodate this level of growth as well. Concerns are cited that bus services can be delayed by queuing traffic, and that the new train line may not solve these issues. **(Alexander Nell, Ben Chivers, C Evans, Julian Bowyer, S Tomlinson, Lisa Farrell, Luke Samuel Charles Evans, M Spencer, Maureen Butterly, P Sterndale, Pill and Easton-in-Gordano Parish Council, R Griffiths, Richard Clarke, Richard W, Rob Harvey, Spencer, C Burnett Rae)**	Pill and Easton-in-Gordano is a relatively sustainable location on a key public transport corridor, with planned enhancements, including bus priority measures, providing connectivity to Portishead and Bristol and is well served by public transport. Delivery of the Metrowest Portishead Rail project has recently begun with re-opening of the line expected 2028 which will provide people working in Bristol or Portishead with a reliable alternative to driving. The IDP identifies junction improvements at M5 J19, and a package of sustainable transport mitigations.
		Concerns regarding the ecological impact of the development and displacement of wildlife. Observation that the site is within the North Somerset & Mendip Bats	The Habitat Regulations Assessment identifies that parts of the site are of low–moderate suitability for SAC bats and have



		SAC zone and close to the Severn Estuary SSSI and impacts should be fully considered. **(Ben Chivers, C Evans, Julian Bowyer, S Tomlinson, Luke Samuel Charles Evans, Maureen Butterly, R Griffiths, Richard W, Rob Harvey, Sustainable Pill & District, C Burnett Rae)**	moderate connectivity with known roosts. It concludes that there is potential for adverse effects on functionally linked land, and that mitigation may be required, including buffer zones around key features and offsetting, to be secured through a site mitigation plan. These matters will be considered in detail at the planning application stage, informed by site-specific ecological surveys and assessments.
		Impact of new development on existing surface water flooding and lack of appropriate drainage measures proposed. Concern that site is located within Flood Zone 3 and it will exacerbate current issues. **(Ben Chivers, S Tomlinson, Lisa Farrell, Luke Samuel Charles Evans, Matt Burley, Maureen Butterly, R Griffiths, Richard Clarke, Richard W, Rob Harvey, Sustainable Pill & District)**	Development proposals will be required to follow the sequential approach, directing development away from areas with highest risk of flooding and providing a site-specific Flood Risk Assessment, including consideration of surface water effects and impacts on nearby watercourses. Appropriate sustainable drainage measures will need to be incorporated to ensure no increase in flood risk on or off-site, in accordance with national policy and emerging Local Plan policies. These matters will be examined in further detail at the planning application



			stage.
		Many residents raise concerns regarding infrastructure provision, with references to housing types, school places, medical facilities, shops, employment provision and other services and facilities. They feel that there are not enough services to accommodate the level of growth proposed around Pill. **(Ben Chivers, C Evans, Julian Bowyer, Lisa Farrell, Spencer, Pill and Easton-in-Gordano Parish Council, Lisa Farrell, Maureen Butterly, Justin Saunders, Luke Samuel Charles Evans, Richard W, Spencer)**	This level of development will help to facilitate the delivery of infrastructure and services to support and benefit both existing and new communities, with major projects detailed in the Infrastructure Delivery Plan (IDP). Other improvements specific to individual development sites are set out in the site-specific requirements in Schedule 1 of the Reg-19 Local Plan, which will be delivered through planning contribution mechanisms (e.g. S106/CIL).
		Potential harm for registered heritage assets and their settings/views such as Church of St George (Grade II*). **(Pill and Easton-in-Gordano Parish Council)**	This has been considered through the HEA. In the site requirements listed in Schedule 1, it is stated that development should follow a heritage-led masterplan which preserves key views from heritage assets and provides buffer zones to maintain a sense of rural setting to the Grade II* Listed Church of St George. Opportunities to create new views to the church tower should also be explored. Historic England are satisfied with the

			approach taken.
		Observation that the capacity of 160 should be seen as a minimum, as it is likely that this can be exceeded. **(Strongvox Ltd)**	Noted. Capacities in the plan are indicative, and will be refined through planning applications in due course.
		Concerns about lack of noise modelling for the impact of the M5 motorway and how noise mitigation would be funded. Also concerns that noise mitigation barriers will not be viable at the northern end of the site due to the motorway being elevated. **(S Tomlinson, Matt Burley, Pill and Easton-in-Gordano Parish Council)**	The Council notes these concerns. Schedule 1 of the allocation requires "detailed noise modelling is required to assess noise from the nearby M5 with appropriate master planning and other features to mitigate any impact," which may necessitate a reduction in the indicative capacity of the site. This matter will be explored further at the planning application stage, where it will be for the developer to demonstrate that future occupants can be protected from motorway traffic noise and that effective mitigation measures can be delivered. National Highways are supportive of this approach.
Land east of Gordano Services	24	Concerns regarding the loss of Green Belt, and suggestions that previously developed sites have not been fully considered, or the density maximised on them.	Due to the increase in North Somerset's housing requirement through the introduction of the mandatory standard method in the NPPF (Dec 2024) North Somerset cannot



		(A Chivers, Pill and Easton-in-Gordano Parish Council, John Pickard, Justin Saunders, L Brown, Lisa Farrell, Luke Samuel Charles Evans, Maureen Butterly, R Griffiths, Richard Clarke, Richard W, Rob Harvey, Sustainable Pill & District)	sustainably meet its housing requirement on sites outside the Green Belt. This constitutes exceptional circumstances and, in such instances, the NPPF directs local authorities to review their Green Belt boundaries and propose alterations to meet their housing need in full. Deliverable previously developed sites have been considered first, as detailed in the Spatial Strategy and Capacity paper.
		Concerns about flooding due to the topography of the site (steep slope) and surface water flooding caused by increased impermeable surfaces. Concerns there has been a lack of engagement with the Environment Agency and residents would like assurances that lower-risk sites were prioritised or that any allocated sites in Flood Zone 3 are justified by the exception test and will be safe in the long term. **(A Chivers, Ben Chivers, L Brown, Luke Samuel Charles Evans, R Griffiths, Richard Clarke, Richard W, Sustainable Pill & District)**	The council has engaged extensively with the Environment Agency and will continue to do so. All site allocations have been considered to be capable of passing the exception test, and planning applications will be required to be supported by proportionate Flood Risk Assessments and to follow the sequential approach, with the exception test applied where necessary in accordance with national policy.
		Provision of community facilities and services have not been properly considered to support the level of growth in the area. There is concern that the level of growth	It is acknowledged that some residents feel the level of growth proposed at Pill and Easton-in-Gordano is disproportionate to the



		proposed is disproportionate to the size of the villages and there is a lack of detail about required infrastructure. **(A Chivers, Ben Chivers, Lisa Farrell)**	size of the village. There are significant benefits of having a critical mass of development to facilitate the delivery of infrastructure to support and benefit the existing and new communities. The plan proposes a range of improvements, with schemes included in the IDP, including a new primary school.
		There is concern about the health impacts on future occupants living near the motorway, especially regarding noise, light and air pollution. It is felt that these effects need to be properly considered and mitigated. **(A Chivers, Jamie Chinner-Evans, Maureen Butterly, Pill & Easton-in-Gordano Parish Council)**	As part of the site requirements set out in Schedule 1 of the Local Plan, we have requested that detailed noise modelling is required to assess noise from the M5 motorway with appropriate master planning and other features to mitigate any amenity impacts for new residents. National Highways are supportive of this approach.
		Heritage issues regarding St George's Church (Grade II*) and St George's Hall. They would like a buffer around St George's Hall/Church. **(A Chivers, Matt Burley)**	This has been considered through the HEA. In the site requirements listed in Schedule 1, we have stated that development should follow a heritage-led masterplan which preserves key views from heritage assets and provides buffer zones to maintain a sense of rural setting to the Grade II* Listed Church of St George. Opportunities to create



			new views to the church tower should also be explored. Historic England are satisfied with this approach.
		Resident would like upgraded cycling facilities between Gordano Services and Bristol that are secured through planning obligations. **(Alexander Nell)**	As part of the development plans, we are proposing improvements for Public Rights of Way and active travel routes around the site. This includes an upgrade of the Public Right of Way linking site to motorway service station, segregated active travel access onto the Avon Cycleway and improvements/developer contributions to fund improvements to the River Avon Trail linking Pill with Bristol.
		Many residents are concerned about the impact of traffic from the development on the surrounding road network, including J19 of the M5, the A369 and other local roads. They feel that transport issues associated with cumulative development in the area have not been fully considered. They feel the proposals have an overreliance on the proposed railway network/active travel improvements and that the capacity/frequency of the new railway line will not be sufficient for the level of growth proposed. There are requests for significant improvements to the public	Pill and Easton-in-Gordano is a relatively sustainable location on a key public transport corridor, with planned enhancements, including bus priority measures, providing connectivity to Portishead and Bristol and is well served by public transport. Delivery of the Metrowest Portishead Rail project has recently begun with re-opening of the line expected 2028 which will provide people working in Bristol or Portishead with a reliable alternative to driving. The IDP identifies



		transport network. **(Alexander Nell, Ben Chivers, Pill and Easton-in-Gordano Parish Council, Jamie Chinner-Evans, John Pickard, Julian Bowyer, L Brown, Lisa Farrell, Luke Samuel Charles Evans, Matt Burley, P Sterndale, R Griffiths, Richard Clarke, Sustainable Pill & District, Justin Saunders, Maureen Butterly)**	junction improvements at M5 J19, and a package of sustainable transport mitigations.
		Concerns regarding the ecological impact of the development and displacement of wildlife. Observation that the site is within the North Somerset & Mendip Bats SAC zone and close to the Severn Estuary SSSI and impacts should be fully considered. **(Luke Samuel Charles Evans, Maureen Butterly, R Griffiths, Richard W, Rob Harvey, Sustainable Pill & District)**	The HRA has considered this matter. For this site the data showed the allocation is of ‘‘low-moderate suitability for SAC bats and has portions with moderate connectivity with known roosts in the wider area’’. We will require bat surveys to be carried out and valuable features (such as hedgerows) to be retained and appropriate mitigation/enhancement measures (e.g. buffer zones around boundary features) to be submitted as part of a future planning application.
		Respondent suggests that the land is classified as Grade 1 farmland by DEFRA’s Provisional Agricultural Land Classification and therefore should be protected. They state the NPPF says this land should only be developed	All the proposed allocations at Pill and Easton-in-Gordano are classified as 3b on the DEFRA agricultural land classification map. This means they do not constitute Best

		as a last resort once lower grade land is exhausted. **(Pill and Easton-in-Gordano Parish Council)**	and Most versatile Agricultural Land.
		Resident would like the fields around Court House Farm to remain as Green Belt, to act as a buffer between Pill and land owned by the Port of Bristol. **(Rob Harvey)**	We are not proposing any development on the fields adjacent to Court House Farm and it is felt that the M5 motorway acts as a natural separation between the edge of the village and land owned by the Port of Bristol.
Pill Green	48	Concerns regarding the loss of Green Belt, and suggestions that previously developed sites have not been fully considered, or the density maximised on them. Some residents feel that the village is being used to meet Bristol's unmet housing need and there has been a lack of cooperation between the two authorities. **(Alexander Nell, Andrew John Barr, Charlie Sayer, Dan Hawkins, Pill and Easton-in-Gordano Parish Council, Emily Shopland, Frank, G Hone, Graham Hopkins, J Dudley, James Lucas, Jamie Chinner-Evans, Kate, Kaylee Sayer, Kevin Payne, Kieran Argo, M Joyner, Lisa Farrell, Louise Hopkins, Luke Samuel Charles Evans, Maureen Butterly, Michael Poole, Mr Burton, P Sterndale, Pill and Easton-in-Gordano Parish Council, R Griffiths, Richard Clarke, Richard W,**	Due to the increase in North Somerset's housing requirement through the introduction of the mandatory standard method in the NPPF (Dec 2024) North Somerset cannot sustainably meet its housing requirement on sites outside the Green Belt. This constitutes exceptional circumstances and, in such instances, the NPPF directs local authorities to review their Green Belt boundaries and propose alterations to meet their housing need in full. Deliverable previously developed sites have been considered first, as detailed in the Spatial Strategy and Capacity paper. The housing allocations identified in the plan are to address North Somerset's own housing needs as calculated using the



		Rik Vanhoutteghem, Robert Walker, Veronique Herzog)	prescribed standard methodology.
		Many residents are concerned about the impact of traffic from the development on the surrounding road network, including congestion at J19 of the M5 and along the A369 (Martcombe Road) corridor. It is requested that a comprehensive cumulative transport modelling assessment is carried out with National Highways and that mitigations must be identified. There is concern that the cumulative level of growth of all the sites is disproportionate to the local transport infrastructure and it will result in increased congestion, pollution and road safety issues which have not been assessed. Comments that the proposals have an overreliance on the proposed railway network which may not be complete in time and that the capacity/frequency of the new trains will not be sufficient for the level of growth proposed. **(Alexander Nell, Ben Chivers, Pill and Easton-in-Gordano Parish Council, Emily Shopland, G Hone, Graham Hopkins, J Dudley, Jamie Chinner-Evans, Julian Bowyer, Kevin Payne, Kieran Argo, M Joyner, S Tomlinson, Lisa Farrell, Louise Hopkins, Luke Samuel Charles Evans, Maureen Butterly, Michael Poole, Mr Burton, P Sterndale, R Griffiths, Richard Clarke,**	Pill and Easton-in-Gordano is considered to be a sustainable location in regards to transport. It is located on/adjacent to a key public transport corridor (A369) providing connectivity to Portishead and Bristol and is well served by public transport (with average 20 min frequency). Improvements to the bus infrastructure are planned, to include bus priority measures and strategically located Local Transport Hubs. Delivery of the Metrowest Portishead Rail project has recently begun with re-opening of the line expected 2028 in line with the delivery of new homes in the area. The capacity of the train service and the level of frequency is beyond the remit of the Local Plan process, but it is expected that a new service will help deliver the modal shift in line with our overall transport strategy and reduce reliance on car travel, especially for people commuting into Bristol from Pill. Extensive transport modelling has been

		Richard W, Rik Vanhoutteghem, Rob Harvey, Robert Walker, S Floyd, Sustainable Pill & District)	undertaken, and we have worked closely with National Highways to identify appropriate mitigation measures, which include increased capacity at J19, complemented by a package of sustainable transport mitigations. These are listed in the IDP.
		Protection of wildlife and the ecological impact of releasing this land from the Green Belt has not been properly considered. Markham Brook woodland is ancient and irreplaceable, providing a range of diverse habitats home to protected priority species such as Greater and Lesser Horseshoe Bats and this will endanger feeding grounds and roosts. Site falls within North Somerset & Mendips Bat SAC Zone and is in close proximity to Severn Estuary SSSI and development would therefore be detrimental. It is requested that Habitat Regulations Assessment (HRA) and updated ecological assessments are carried out for the site, along with consultation with Natural England for habitat solutions. **(Alexander Nell, Cat Abel, Pill and Easton-in-Gordano Parish Council, Kevin Payne, Luke Samuel Charles Evans, Maureen Butterly, Mr Burton, P Sterndale, R Griffiths, Richard White, Rob Harvey, Sian Narracott, Sustainable Pill and District, J Spicer)**	The Council recognises the sensitivity of the site, particularly its proximity to Markham Brook ancient woodland/SNCI and its location within the North Somerset and Mendips Bat SAC Zone. A Habitat Regulations Assessment (HRA) has been undertaken as part of the Local Plan evidence base to assess potential effects on the National Site Network of Special Areas of Conservation, Special Protection Areas and Ramsar sites. In respect of this allocation, the HRA concluded that the site is of low–moderate suitability for bats with moderate connectivity to known roosts. It identified that there is potential for adverse impacts on functionally linked land through loss or disturbance, and that mitigation may therefore be required. This could include buffer zones to boundary features and

			offsetting measures, to be secured through a site-specific mitigation plan to be discussed at the planning application stage. The site requirements set out in Schedule 1 of the Regulation 19 Local Plan reiterate that development must provide a buffer strip to Markham Brook and incorporate appropriate flood mitigation measures to ensure no increased downstream flood risk.
		Concern raised about the loss of agricultural land – largely Grade 2 (very good quality) with pockets of Grade 1 (excellent quality) - and building on this is not in line with guidance within the NPPF, which prioritises development on lower grade land first. **(Robert Walker, Rob Harvey, Richard White, Richard Clarke, Pill & Easton-in-Gordano Parish Council, Kevin Payne, Justin Saunders, Cat Abel)**	All the proposed allocations at Pill and Easton-in-Gordano are classified as 3b on the DEFRA agricultural land classification map. This means they do not constitute Best and Most Versatile (BMV) agricultural land.
		Provision of community facilities and services have not been properly considered to support the level of growth in the area. There is concern that the level of growth proposed is disproportionate to the size of the villages and there is a lack of detail about required infrastructure. Suggestions that funding for community facilities and infrastructure upgrades should be secured in advance of	It is acknowledged that some residents feel the level of growth proposed at Pill and Easton-in-Gordano is disproportionate to the size of the village. There are significant benefits of having a critical mass of development to facilitate the delivery of infrastructure to support and benefit the



		considering granting planning permissions. The level of growth conflicts with the Neighbourhood Plan which caps development at 150-200 homes. **(Alexander Nell, M Joyner, J Dudley, Emily Shopland, Dan Hawkins, Charlie Sayer, Mr Burton, Pill & Easton-in-Gordano Parish Council, Kevin Payne, Kieran Argo, S Tomlinson, M Boyd, Lisa Farell, G Hone, Maureen Butterly)**	existing and new communities. The plan proposes a range of improvements, with schemes included in the IDP, including a new primary school. Development contributions are subsequently agreed through the planning application process. The Neighbourhood Development Plan for Pill and Easton-in-Gordano is aligned with the strategic context set out in the adopted Core Strategy of the current Local Plan. This replacement Local Plan will supersede that strategic context.
		Concern about the topography of the site (steeply sloped) and how this would impact on flooding. Land around Markham Brook and Pill Green include areas within Flood Zone 2/3 with both fluvial and tidal flood risks. there is also concern about the impact of development and more impermeable surfaces on the stream at the back of Brookside and Crockerne Drive. **(Ben Chivers, Cat Abel, Charlie Sayer, Graham Hopkins, Pill & Easton-in-Gordano Parish Council, Dan Hawkins, Emily Shopland, Maureen Butterly, Rob Harvey, Kevin Payne, Kieran Argo, Luke Samuel Charles Evans, Lisa Farrell, Louise Hopkins, Maureen**	The site requirements set out in Schedule 1 of the Regulation 19 Local Plan make clear that development must incorporate appropriate flood risk mitigation measures and ensure that there is no increase in flood risk downstream. This will be demonstrated through a site-specific Flood Risk Assessment and drainage strategies, which will need to illustrate compliance with national policy and Local Plan policies, including DP9 and DP11. These policies require development to be safe for its lifetime, without increasing flood risk elsewhere, and



		Butterly, Michael Poole, Mr Burton, P Sterndale, Richard Clarke, Richard W, Rob Harvey, Robert Walker, S Floyd, Sustainable Pill and District)	to incorporate sustainable drainage systems (SuDS) to manage surface water effectively. Detailed technical work at the application stage will need to consider all potential flood risks, the impacts of site levels and topography, and the potential effects of increased impermeable surfaces. This will include ensuring that runoff rates are appropriately managed and that existing watercourses are not adversely affected.
		Concerns are raised about the loss of these fields as a recreational space for local residents. It is said that the footpaths which cross the site are identified as popular walking routes and there is concern the development will stop this local amenity use. Also concern there are no upgrades to existing public footpath infrastructure providing safe walking routes to public transport. **(J Dudley, Justin Saunders)**	The site requirements set out in Schedule 1 of the Regulation 19 Local Plan seek to ensure that pedestrian connectivity is maintained and enhanced. This includes a requirement for a formal crossing to existing bus stops on the A369 to improve safe access to public transport. In addition, existing Public Rights of Way will be retained within the development. This includes the continuation of Bridleway LA8/33/40 to the east and over Markham Brook, ensuring continued access for both existing and future residents. Given the scale of the site, it is also anticipated that the development will

			incorporate areas of public open space as part of a comprehensive masterplan. This will provide opportunities for both formal and informal recreation within the scheme.
		Concerns regarding construction impacts, including noise, vibration, traffic disruption and risk of sediment fallout into the stream. **(Cat Abel)**	These matter would be addressed through the requirement of a Construction Environmental Management Plan (CEMP) as part of a planning application.
		Development will have a negative impact on the rural characteristics of the area which is detrimental to the wider landscape of the valley. Feel the proposed development is fragmented and quite disconnected from the rest of the village due to the distance and topography of the site in relation to the Village Centre. **(Charlie Sayer, Emily Shopland, Jamie Chinner-Evans, Kevin Payne, Matt Burley, Maureen Butterly, Michael Poole, Mr Burton, R Griffiths, Rik Vanhoutteghem, Rob Harvey, Robert Walker, S Floyd, J Spicer)**	The Local Plan process has considered matters of landscape sensitivity, settlement pattern, and the need to accommodate growth in sustainable locations – especially on the edge of existing towns and larger villages. Policy SP6 seeks to ensure that development responds appropriately to local character, and any future proposal will be required to demonstrate compliance with this and national policy set out in the NPPF. Matters relating to connectivity, layout, and integration with the existing village will be addressed in more detail at the master planning stage to ensure the development is

			well integrated into the existing urban area.
		It is felt that having a single entry point to this development from Brookside is not appropriate as it could not accommodate the associated traffic. **(Jamie Chinner- Evans)**	At this stage, access arrangements have not been finalised. However, it is anticipated that a new principal access point will be provided from the A369 Martcombe Road. Detailed consideration will be given through the design process to ensure that the site is appropriately connected to the existing highway network and that traffic impacts are suitably managed.
		There is a concern that the development has not taken into consideration the need for increased employment and leisure opportunities for new residents. **(Justin Saunders)**	The allocation of the site through the emerging Local Plan forms part of a wider strategy to deliver sustainable communities, which includes not only housing but also access to jobs, services, and leisure facilities. While the site itself is primarily proposed for residential development, as well as a primary school, it will be expected to integrate with the existing settlement of Pill and its services, as well as benefit from improved connectivity to nearby employment centres.
		The developer requests that their Parcel 4 (Land south	Exceptional circumstances need to be



		east of western part of Easton-in-Gordano) adjoining the A369 be removed from Green Belt boundary mapping and the full site boundary of land at Pill Green shown as allocation, as they feel that it makes a weak contribution to Green Belt purposes. **(Catesby Estates)**	demonstrated to remove land from the Green Belt. This land is not part of the proposed allocation at Pill Green and as such there are no exceptional circumstances to justify its removal from the Green Belt.
		Strong local opposition to the allocation, including a petition. **(Various consultees)**	The Council acknowledges the strong local opposition to the allocation. Individual points of concern have been addressed separately.
		The Environment Agency would like to ensure that there will be sufficient maintenance of the Markham Brook watercourse and that vehicle access next to the Markham Brook should be retained for future maintenance and emergencies. **(Environment Agency)**	Noted. Matters relating to the ongoing maintenance of the Markham Brook and the retention of suitable access for maintenance and emergency purposes will be addressed as part of the detailed design and landscaping proposals. Where necessary, appropriate planning conditions will be imposed to secure continued access to the watercourse and to ensure that its long-term maintenance is appropriately managed in consultation with relevant bodies.
		Suggestions to relocate the proposed active travel link	While the development of safe and direct



		crossing the Markham brook ancient woodland, to avoid harm and damage to the ancient woodland and its stream. **(Cat Abel, Pill and Easton-in-Gordano Parish Council, Justin Saunders, Sian Narracott, Rob Harvey, Catesby Estates)**	active travel routes connecting the development to education, employment and community services is essential and a crossing of Markham Brook would provide the most direct route from the site towards St Katherine's School, the exact route and delivery of the proposed active travel route are indicative at this stage and more feasibility work will need to be carried out to assess the options available. Detailed design, including route alignment, engineering feasibility and environmental impacts, will be fully assessed at the planning application stage. This will include consideration of alternative alignments to avoid or minimise impacts on ancient woodland and associated habitats, as well as the incorporation of appropriate mitigation measures where required. Should this alignment not be achievable for practical or ecological reasons, then a suitable alternative provision will be sought. It is therefore proposed to make a minor amendment to the policy wording to reflect this with Markham Brook identified as the 'desirable route', if it is feasible.

		The primary school plans are unfunded with no delivery mechanism. **(Pill and Easton-in-Gordano Parish Council)**	The provision of land for, and contribution towards the delivery of, a primary school (including early years provision in accordance with government requirements) is set out as a site specific requirement for this site in the plan. It is classified as 'essential infrastructure' within the IDP and it will be funded by proportionate developer contributions from all sites around the village.
		Suggestion of improvements to the A396 active travel route. **(Jamie Chinner-Evans)**	As part of the site requirements set out in Schedule 1 of the Local Plan, we require the creation of an active travel route along the frontage of site which is parallel to the A369, along with improved crossing points to connect the development with existing bus stops.
Land at Pill Road	20	Concerns regarding the loss of Green Belt, and suggestions that previously developed sites have not been fully considered, or the density maximised on them. **(Alexander Nell, Charles Herring, Pill and Easton-in-Gordano Parish Council, Frank, R Griffiths, Richard Clarke, Richard White)**	Due to the increase in North Somerset's housing requirement through the introduction of the mandatory standard method in the NPPF (Dec 2024) North Somerset cannot sustainably meet its housing requirement on sites outside the Green Belt. This constitutes exceptional circumstances and, in such



			instances, the NPPF directs local authorities to review their Green Belt boundaries and propose alterations to meet their housing need in full. Deliverable previously developed sites have been considered first, as detailed in the Spatial Strategy and Capacity paper.
		Many residents are concerned about the impact of traffic from the development on the surrounding road network, including congestion at J19 of the M5. It is felt that the amount of traffic travelling through Ham Green, Haberfield Hill and Pill Road is already unsustainable and dangerous for pedestrians and cyclists – more housing is likely to exacerbate this issue. There is concern that the cumulative level of growth is disproportionate to the local transport infrastructure and it will result in increased congestion, pollution and road safety issues which should be properly assessed. Also feel the proposals have an overreliance on the proposed railway network and that the capacity/frequency of the new railway line will not be sufficient for the level of growth proposed. **(Alexander Nell, Charles Herring, Kevin Payne, Matt Burley, P Sterndale, R Griffiths, Richard Clarke, Richard White)**	Pill and Easton-in-Gordano is a relatively sustainable location on a key public transport corridor, with planned enhancements, including bus priority measures, providing connectivity to Portishead and Bristol and is well served by public transport. Delivery of the Metrowest Portishead Rail project has recently begun with re-opening of the line expected 2028 which will provide people working in Bristol or Portishead with a reliable alternative to driving. The IDP identifies junction improvements at M5 J19, and a package of sustainable transport mitigations.

		Concerns about the ecological impact of the development and displacement of wildlife, notably the impact on ancient woodland at Markham Brook SNCI, the Severn Estuary SSSI and the Bat Special Area of Conservation (SAC). **(Alexander Nell, Cat, Charles Herring, Pill and Easton-in-Gordano Parish Council, Maureen Butterly, P Sterndale, R Griffiths, Richard W, Rob Harvey, Sian, Sustainable Pill & District)**	A Habitat Regulations Assessment (HRA) has been undertaken to assess the potential effects of the North Somerset Local Plan on the National Site Network of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. As a result, appropriate mitigations have been incorporated into the Plan to ensure there are no likely significant effects on these important designated sites. The impact on the North Somerset and Mendips Bat SAC Zone was assessed which concluded that ‘‘a large portion of the allocation is of moderate-high suitability for SAC bats and has moderate connectivity with known roosts in the wider area’’. Given the suitability and connectivity of the allocation, we would expect valuable features to be maintained (e.g. hedgerows) and appropriate mitigation measures (e.g. buffer zones) to be included and these issues will be addressed further at the planning application stage. Ecological surveys must satisfy local and national planning guidance.
		Concern that part of the site around Markham Brook lies	The site’s allocation has been informed by

		in Flood Zones 2/3 and as the site directly abuts the stream it will inevitably increase water run-off, despite proposed mitigation downstream, increasing likelihood of flooding in the centre of Pill. Increasing hard surfacing near Markham Brook could worsen flooding for existing homes. It is felt that there has been a lack of consultation with the Environment Agency. **(Pill and Easton-in-Gordano Parish Council, Maureen Butterly, P Sterndale, R Griffiths, Richard Clarke, Sustainable Pill & District)**	the Strategic Flood Risk Assessment, which confirms that development can be delivered safely on this site with appropriate mitigation to ensure the risk of flooding is not increased either on or off-site. The Environment Agency has been consulted as a statutory consultee and will continue to be engaged as proposals for this allocation progress through the planning application process.
		Concern raised about the loss of agricultural land - DEFRA classifies this land as Grade 2 (good quality) and building on this is not in line with national planning guidance. **(Pill and Easton-in-Gordano Parish Council, Richard Clarke)**	All the proposed allocations at Pill and Easton-in-Gordano are classified as 3b on the DEFRA agricultural land classification map. This means they do not constitute Best and Most versatile Agricultural Land.
		Homes along Pill Road experience noticeable noise and traffic vibration issues. Additional housing will increase traffic and intensify these impacts particularly for older properties. Noise mitigation and assessment should be carried out if the site is retained.	Amenity issues for local residents will be carefully considered, and issues regarding noise pollution will be dealt with carefully during the planning application stage and if problems are identified, we would seek appropriate mitigation measures to ensure

		(Kevin Payne)	this does not impact the quality of life of either existing or new residents.
		Concern is raised about the road safety risks from the cumulative development proposed in Pill and how this can be addressed for pedestrians, cyclists, and schoolchildren. They request a funded and deliverable upgrades for active travel to improve safety, as they are not currently shown to be viable or deliverable. **(Kevin Payne, Maureen Butterly)**	To reduce car dependency and encourage modal shift in line with our transport strategy, we have established a package of measures to improve active travel in the area which are set out in the Infrastructure Delivery Plan (IDP) and the site requirements in Schedule 1. This includes active travel improvements along Pill Road/Ham Green serving St Katherine's School, an upgraded crossing point between site and St Katherine's School and an active travel route between the site and the Pill Green allocation, which is likely to cross Markham Brook. If the active travel route over Markham Brook is unfeasible, then a reasonable alternative route can be proposed. We expect these measures to be delivered as part of a comprehensive scheme for the site, but if they cannot for any reason, then we will expect planning contributions to be made to ensure their delivery.
		A buffer zone should be in place to reduce the risk of	The site requirements set out in Schedule 1 of the Reg-19 Local Plan state that



		flooding from Markham Brook. **(Matt Burley)**	"development must provide a buffer strip to Markham Brook main river and flood risk mitigations will be needed to ensure no increased flood risk arises downstream."
		The developer would like the wording regarding site capacity to be changed so that it reads: 'permit up to 100 dwellings' and additionally 'support, but not require, a care home on the site' (or similar wording). They say that initial work undertaken shows that the site may be able to deliver a circa. 70-bed care home and they would like the supporting text to be worded to allow for this, but without making it an absolute requirement. **(Waddeton Park Ltd)**	As with all sites, the capacity shown in the plan is indicative at this stage, and can be refined as masterplanning progresses for sites and will subsequently be fixed through planning applications.
		The developer would like the active travel requirement between Pill Green and Land at Pill Road, crossing Markham Brook, to be removed from the list of site requirements as they feel that there are already accessible walking routes to the nearby school and that additional connections are not necessary to make the site acceptable in planning terms. Local residents are concerned that the proposed active travel route is not practical due to fluctuating water levels and steep banks.	Development of safe and direct active travel routes connecting developments and providing access to education, employment and community services is essential. Whilst a crossing of Markham Brook would provide the most direct route, should this alignment not be achievable for practical or ecological reasons, then an alternative provision shall be required. A minor amendment to the policy

		(Waddeton Park Ltd, Cat Abel, Justin Saunders, Julian Bowyer, Rob Harvey, Sian, Sustainable Pill & District)	wording is proposed to reflect this.
		The developer strongly supports the allocation of Land at Pill Road. **(Waddeton Park Ltd)**	Noted.
Land at Ham Green	10	Concerns from residents regarding the impact of traffic from developments in Pill on the surrounding road network and other infrastructure, and a lack of certainty over funding. Concern that the allocation of growth to Pill is overly reliant on the proposed railway network. There are also particular localised concerns regarding Perrett Way and Macrae Road that may be impacted by development of this site. **(A Franklin, Julian Bowyer, Luke Samuel Charles Evans, Maureen Butterly, Richard Clarke, Pill and Easton-in-Gordano Parish Council, Julian Bowyer, Matt Burley, H Burnand , Kirstie Wilkins)**	Highway impacts have been assessed through the transport assessment, and appropriate mitigations identified. These are listed, and costed, in the Infrastructure Delivery Plan, along with other infrastructure requirements, and contributions towards them will be secured through future planning applications. Delivery of the Metrowest Portishead Rail project has recently begun with re-opening of the line expected 2028. In terms of site specifics, the exact road layout and access arrangements will be addressed through a planning application.
		Concerns about the loss of agricultural land, impacts on rural character, ecological impacts and potential flood risk	This is a previously developed site. These points are addressed under other sites where



		issues arising from the developments in Pill cumulatively. **(A Franklin, Luke Samuel Charles Evans, Maureen Butterly, Richard Clarke)**	they are relevant concerns.
		Pill and Easton-in-Gordano Parish Council would like the site removed, but if it is retained to cap the capacity at 20–30 affordable homes. **(Pill and Easton-in-Gordano Parish Council)**	The capacity identified is indicative and subject to detailed consideration at planning application stage.
TOWNS			
Weston-super-Mare			
Parklands Village	3	Support the plan's recognition that Locking Parklands can accommodate additional homes. **(Homes England)**	Support noted.
		Request that the boundary is checked to reflect the extant planning permissions. **(Homes England)**	A proposed change is recommended by NSC to the settlement boundary to reflect the consents that are now in place.
		Query over whether the recent pre-application discussions that have been held to consider the potential for	This additional capacity is included within the



		accommodating around 250 extra dwellings on the site have been included in the Council's assumptions for the site. **(Mead Realisations)**	indicative capacity identified in the plan.
		Request for the site specific requirements to reflect the existing planning permissions rather than the Weston Villages SPD. **(Homes England)**	The site specific requirements state: • *To be developed in accordance with outline planning consents and Weston Villages Supplementary Planning Document.* This is considered an appropriate position, given that not all parcels are fully consented yet, and the principles in the SPD remain relevant.
Winterstoke Village	0	-	-
Locking Road Car Park	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Former Leisuredome	2	Observation that flood risk is not mentioned in the	Noted. There is a statement at the top of



site/Parklands site B		schedule, despite the site being at risk of flooding. **(Environment Agency)**	schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
		Support inclusion of this site for allocation. **(Homes England)**	Support welcome.
Weston Rugby Club	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Land west of Winterstoke Road	2	The site is in Flood Zone 3, (main river watercourse), and the Cross Rhyne runs along the southern boundary of the site. The Cross Rhyne is narrow and struggles with conveyance due to the limited capacity within the channel. There are a number of narrow culverts/bridge crossings and development may increase flood risk. Operational access must not be restricted along the banks. **(Environment Agency)**	Noted. These constraints will need to be carefully considered during any future planning applications, including the requirement to demonstrate that development will not increase flood risk on or off site. The Council also acknowledges the need to maintain unrestricted operational access along the bank of the Cross Rhyne and this requirement will be reflected in future site



			planning/design work.
		Assertion that whilst most of the site is situated within defended Flood Zone 3 flood mitigation through technical solutions can be delivered. The site can be developed with resistance/resilience to the 'design flood' events which will be achieved through the implementation of the mitigation measures. **(Persimmon Homes)**	Noted. The council's sequential test paper and SFRA Level 2 support these conclusions from the developer, as long as any future development proposals demonstrate that the site can be made safe through robust resistance and resilience measures designed to manage future flood events. These requirements will be carefully considered at the planning application stage.
		Support for the allocation of the site within Schedule 1 with capacity for around 134 homes. **(Persimmon Homes)**	Support welcomed.
Sunnyside Road	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Woodspring Stadium,	1	Observation that flood risk is not mentioned in the	Noted. There is a statement at the top of schedule 1 clearly stating that as well as



Winterstoke Road		schedule, despite the site being at risk of flooding. **(Environment Agency)**	complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Gas Works	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Dolphin Square	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Land west of Trenchard Road	1	The Environment Agency said they could not locate this site on the policies map in the site schedule document. **(Environment Agency)**	We can confirm that this site is listed within Schedule 1 and is included on the Local Plan 2041 policies map. It is directly adjacent to the Locking Parklands allocation which is why it may have been overlooked.



Police Station/ Magistrates Court/ Roselawn	0	-	-
Anson Road	0	-	-
Land at Bridgwater Road	1	Observation that there are a number of local, national and international nature conservation designations within 500m of the allocation site and development here has the potential to disrupt the connectivity between these sites which currently provides a corridor between habitats. **(Avon Wildlife Trust)**	Concerns noted, acknowledging that this development has consent and is under construction.
Former Bournville School site	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Knightstone Road Hotels	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments



			must also comply with all other relevant policies in the plan.
Former Sweat FA site, Winterstoke Road	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Former Police Depot, Winterstoke Road	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Nightingale Close, Mead Vale	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Former TJ Hughes,	0	-	-



High Street			
Land at Atlantic Road South	0	-	-
Land to the rear of Locking Road	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Land adjacent to Woodside Avenue	0	-	-
Land north of Lyefield Road and Lower Norton Lane	2	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
		Concern that this site is unsuitable for development and that local residents' views are not being considered. Request for the allocation to be deleted.	The Council acknowledges the concerns raised about the suitability of the site and wishes to reassure residents that their views



		(Gill Bennett)	are an important part of shaping the Local Plan. Public engagement has been carried out and feedback from local communities, statutory bodies and stakeholders has directly informed the development and refinement of the Plan.
69-71 Locking Road	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Land south of Manor Farm, north of Lyefield Road	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
Greenways Farm, Lyefield Road	2	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments



			must also comply with all other relevant policies in the plan.
		Suggestion from local resident that the site should be deleted as an allocation and reserved for future crematorium expansion. **(Gill Bennett)**	Given the significant pressure to meet local housing needs and the evidence supporting the suitability of this site for development – including the Strategic Housing Land Availability Assessment (SHLAA), the Council does not consider removal from the allocation for this reason to be justified.
Former Grand Central Hotel	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.
London Inn	1	Observation that flood risk is not mentioned in the schedule, despite the site being at risk of flooding. **(Environment Agency)**	Noted. There is a statement at the top of schedule 1 clearly stating that as well as complying with the specific requirements listed in the schedule housing developments must also comply with all other relevant policies in the plan.



Land at Leighton Crescent	11	Concern that development would have a detrimental impact on surrounding designated areas such as the Mendip Hills National Landscape and nearby SSSIs, causing displacement of wildlife. Assertion that this site is part of a SSSI. **(A Hicks, D Manaei, Grace Kasouris, JCHoward, P Horrigan)**	For the avoidance of doubt, the site does not have SSSI status. The concerns regarding impacts on wildlife and the National Landscape are noted. Full ecological impacts will be addressed through site specific surveys undertaken at planning application stage, which will identify any potential impacts to sensitive habitats and ensure appropriate mitigation is secured.
		There is concern that developing this site would result in an amalgamation of Oldmixon with the village of Bleadon, which will be absorbed by the Weston-super-Mare urban area and that could harm the rural characteristics of the area. Bleadon Parish Council objects to the proposal as they feel it would erode the separation between Weston-super-Mare and Bleadon. They argue this would set a precedent for further eastward and southward expansion toward the village and that keeping the current designation is essential to limit development to genuine rural exception sites only. **(A Hicks, Grace Kasouris, Jeremy Baber, Bleadon Parish Council)**	Although allocating this site will connect Hillcote with the edge of the Weston-super-Mare urban area at Oldmixon, it is felt that this will not compromise the physical separation between the settlement boundaries of Bleadon and Weston-super-Mare. The settlement boundary has been drawn tightly around Bleadon Village and an urban boundary around Weston-super-Mare. This will prevent further encroachment of development between the urban fringe of Weston and the village of Bleadon.



		Objection to this allocation on the basis it is felt that there are not enough amenities and facilities (such as schools and medical centres) within reasonable walking distance or accessible by public transport given the topography of the area and a lack of pavements in the vicinity. There are concerns that this will mean all services will only be accessed by the private car, going against net zero ambitions. **(A Hicks, Andrew Katsouris, Jean Howard, James Dalton, Jeremy Baber, L Hazzard, P Horrigan, Martyn Frampton)**	For the purposes of plan-making assessment the Spatial Strategy paper identifies Bleadon as a 'category B' settlement, which means it is considered to be relatively sustainable as it is in close proximity to the 'higher order settlement' of Weston-super-Mare. Bleadon has some of its own services but is also within easy access of a wide range of facilities within Weston. Schedule 1 states that any development would be expected to undertake footway improvements along Bleadon Hill and make a financial contribution towards a bus service provision, and financial contributions may be sought towards service provision if, at the time of a planning application, it can be demonstrated that these are necessary.
		Local concerns raised about the impact this development would have on the surrounding road network which has narrow lanes, particularly where Leighton Crescent joins Bleadon Hill. This is described as dangerous and an accident hot spot. Suggestions are made around highway widening and the addition of footpaths. Many respondents feel that the area has already accommodated a large	The Council acknowledges concerns about the capacity and safety of the surrounding road network. These issues have been carefully considered through the Local Plan process and will be considered at a site specific level in any subsequent planning applications, which will require a detailed



		volume of development in recent years and that cumulatively this has caused worsened traffic congestion. **(A Hicks, Andrew Katsouris, Grace Kasouris, Jean Howard, Jeremy Baber, L Hazzard, Martyn Frampton, P Horrigan)**	transport assessment and modelling to understand impacts and identify appropriate mitigation measures. This will include evaluating access arrangements (entry and egress), potential road safety issues and any improvements for pedestrians along Bleadon Hill. The Council also recognises concerns about congestion as a result of cumulative development in the area and improvements to the road network are outlined in the Infrastructure Delivery Plan to accommodate planned growth in and around Weston-super-Mare. This includes public transport upgrades and active travel improvements to encourage more walking, cycling and bus use for short journeys.
		It has been suggested that the drainage from this site would have detrimental effects on the existing homes in Bleadon at the bottom of the site. **(D Manaei)**	The Council notes the concerns regarding potential drainage impacts on existing homes in Bleadon Village. Any future planning application for this site will be required to provide a detailed site-specific Flood Risk Assessment and sustainable drainage



			strategy (SuDS) to demonstrate that surface water will be managed appropriately and that runoff will not increase flood risk to properties downslope - in line with local and national policies.
		Reference is made to previous planning applications on the site and in the area that have been refused. **(Grace Kasouris, Jeremy Baber, Martyn Frampton)**	The Council notes the reference to previous planning applications. Each allocation and any subsequent planning applications for the site must be assessed on their own merits, using up-to-date evidence and current planning policy. While past decisions are important material considerations, they do not determine the outcome of new proposals brought forward through the Local Plan process as new proposal may differ in ways that address previous issues.
		Reference has been made to an old Church Commissioners Covenant for the site which states that a maximum of five dwellings per acre can be erected on the site, raising questions about the legality of the proposal. **(Grace Kasouris, D Manaei)**	The Council notes the reference to the historic Church Commissioners Covenant. However, private covenants are not a material planning consideration and therefore do not determine the outcome of Local Plan allocations or future planning applications. Such covenants are private legal matters between landowners and would need to be



			resolved separately by the parties involved. Planning decisions must instead be based on national and local planning policy and the evidence supporting the proposed allocation.
Wider Weston-super-Mare			
Uphill Grange, Uphill	1	Observation that there are a number of local, national and international nature conservation designations within 500m of the allocation site and development here has the potential to disrupt the connectivity between these sites which currently provides a corridor between habitats. **(Avon Wildlife Trust)**	Concerns noted, acknowledging that this development has consent.
Land west of Hutton	3	Historic England note that the site is adjacent to the Grade II Listed Grange Farmhouse and Hutton Conservation Area. The HEA indicates that even with a series of mitigations, there would still be a residual harm to the setting of the Farmhouse, with the degree of harm not defined. If the site is to be allocated the council will need to justify that harm and demonstrate it has afforded great weight to the conservation of the Listed Building consistent with	Schedule 1 identifies specific mitigation measures which should be secured through future master planning and a subsequent planning application. The residual harm to the setting of the conservation area and the Grade II listed Grange farm after identified mitigation measures are in place is expected to be less than substantial. This is agreed in a statement of common ground with Historic



		paragraph 212 of the NPPF and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. **(Historic England)**	England.
		Queries raised about the scale of growth around rural settlements and whether there are enough public infrastructure/local amenities in place to support the local population increase (e.g. schools, doctor's surgeries) and concern that no solutions have been proposed to mitigate the impacts, which is contrary to national policy. **(Michelle Parsons, Shelia Rhodes)**	The Council notes concern regarding the capacity of local schools, healthcare services and other infrastructure to support additional growth in Hutton. The Plan identifies where new or expanded infrastructure may be needed in the Infrastructure Delivery Plan, and the Council will seek appropriate developer contributions to ensure that education, healthcare, utilities and other essential facilities are provided in step with new development and in line with national policy requirements.
		Request for it to be demonstrated how biodiversity, habitat connectivity, and environmental impacts have been jointly considered, including ecological assessments and a strategy to protect connected habitats and wildlife corridors around proposed development sites. Request to include a policy requirement for biodiversity net gain.	Ecological matters have been considered at a high level through the evidence base, including the Habitat Regulations Assessment and Green Infrastructure Strategy, and further site specific surveys will be required at the planning application stage to ensure any impacts are fully understood



		(Sheila Rhodes)	and appropriately mitigated. In addition, the Plan includes a requirement for Biodiversity Net Gain, ensuring development contributes positively to the natural environment.
Elm Grove Nursery, Locking	2	Concerns that local facilities and amenities won't be able to cope with additional population arising from this and other local sites. Observation that there are poor public transport links and that pedestrian safety could be improved. **(Michelle Parsons)**	Locking is considered to be a relatively sustainable settlement in the plan-making hierarchy given its proximity to the higher order settlement of Weston-super-Mare. As part of any future scheme improved footways will be required.
		It is felt that the potential impacts on local biodiversity and the environment have not been properly addressed, nor has the risk of flooding along the northern boundary of the site. **(Michelle Parsons)**	Flood risk along the northern boundary is recognised in the Local Plan evidence base, including the Strategic Flood Risk Assessment and the Flood Risk Sequential Test of Proposals paper. These documents identify that the northern edge of the site lies within tidal Flood Zone 3a but that this area can be avoided. Any future planning application will be required to submit a detailed, site-specific flood-risk and surface-water drainage strategy. Ecological matters have been considered at a high level through the Local Plan HRA, and detailed



			ecological surveys and mitigation would be required at the planning application stage to ensure impacts are fully addressed.
		The promotor supports the allocation of Elm Grove Nursery for 110 dwellings but are unsure why the current boundary does not include the full extent of the two fields. **(Gladman Developments)**	The allocation boundary is drawn to avoid development in the northernmost part of the site, as this area is at risk of flooding in future. This also aligns with the strategic gap boundary, a matter which is covered in Policy LP10.
Land north of Locking	0	-	-
Land to the west of Elborough	24	Concerns about increased traffic congestion, air pollution and road safety issues in the area, including at the Banwell Road/A371 junction, through Elborough, Locking and Hutton villages, Old Banwell Road, Banwell Road, The Bury, Locking Moor Road, Hutton Moor Roundabout and J21 of the M5 with necessary improvements/mitigation measures like traffic calming/junction improvements not yet detailed or funded secured through enforceable mechanisms (e.g. S106). Suggestion that there has not been comprehensive transport modelling or clear cross-boundary approach to	The Local Plan is supported by robust transport evidence and an Infrastructure Delivery Plan (IDP), which identifies a package of improvements required to mitigate cumulative impacts. Any future planning applications will also need to provide detailed transport assessments addressing their own, as well as cumulative, impacts and demonstrating



		assess the wider transport impacts. **(A Shipton, E Jackson, Jules Turnbull, Michelle Parsons, Neil Archibald, Nick Siangolis, Nicola Payne, Ruth Musandu, Robert Smart, Roger Nicholson, Sheila Rhodes)**	safe and appropriate mitigation.
		References to a lack of public transport and active travel options meaning that new development here would result in car dependency, particularly given the lack of essential services at Elborough. **(A Shipton, E Jackson, Jules Turnbull, Michelle Parsons, Neil Archibald, Nick Siangolis, Ruth Musandu, Sheila Rhodes, Nick Bowler)**	Any future planning application must demonstrate how a joined-up sustainable travel network will link the site, together with Land north of Banwell Road, to Locking Village and the A371 strategic cycleway and Parklands. Required measures include an active-travel priority crossing on Banwell Road connecting to PROW AX18/1/20, along with contributions to improved bus services. These improvements will be expected to be delivered alongside development to ensure sustainable, accessible travel choices are available for future residents.
		Concerns regarding a negative ecological impact if this development were to proceed on existing wildlife habitats and protected species. The site contains established hedgerows and rhynes/ditches, which are priority habitats and important movement routes for wildlife. Development	At a high level, the Habitat Regulations Assessment (HRA) identifies the site as having low–moderate connectivity to known bat roosts and concludes it is unlikely to materially affect functionally linked land for

		would fragment these corridors and permanently remove high-value habitat, contrary to national policy requirement to protect and enhance the natural environment. Requests for ecological assessments, biodiversity net gain (BNG) enhancements and a habitat connection strategy around Elborough and Locking. **(A Shipton, E Jackson, Isabelle Lemoille, Jules Turnbull, Michelle Parsons, Neil Archibald, Nick Siangolis, Nicola Payne, Sheila Rhodes, Nick Bowler)**	the North Somerset & Mendip Bats SAC, with the M5 providing a partial barrier to movement. Any future planning application will require detailed ecological surveys, which will include assessing impact on bats, evaluation of hedgerows, rhynes and other priority habitats, and proposals for habitat retention, mitigation and Biodiversity Net Gain (BNG). Development will only be supported where ecological impacts are fully assessed, mitigated and where possible deliver measurable enhancements.
		Flood risk concerns, especially around drainage and surface water flooding caused by more impermeable surfaces from the new development exacerbating current issues with surface water, especially after heavy rainfall. There is concern that the evidence base does not demonstrate that surface water can be safely managed or attenuated to prevent flooding issues downstream. **(A Shipton, Isabelle Lemoille, Jules Turnbull, Janette Baker, Mark Jaloszynski, Michelle Parsons, N**	We note concerns about existing flood risk and surface water in the area, including issues on Banwell Road by Elborough Farm. While the Local Plan evidence has considered flood-risk issues at a strategic level, any future planning application must provide a site specific Flood Risk



		Manville, Neil Archibald, Nick Siangolis, Nicola Payne, Nicola Payne, Ruth Musandu, Roger Nicholson, Sheila Rhodes, Nick Bowler)	Assessment and surface water management strategy. This will need to demonstrate how drainage will be safely managed and attenuated, how runoff from new impermeable surfaces will be controlled, and how SuDS measures will prevent increased flood risk on and off the site. Development will only be supported where evidence shows flood risks can be effectively mitigated.
		Concerns that the level of growth proposed in this location is disproportionate and infrastructure capacity and public service provision cannot support this level of development. Residents do not consider this to be a 'sustainable' location due to the isolated nature of the site with poor services. **(A Shipton, Isabelle Lemoille, Jules Turnbull, Janette Baker, Michelle Parsons, N Manville, Nick Siangolis, Nicola Payne, Ruth Musandu, Sheila Rhodes, Nick Bowler)**	We note concerns about the capacity of local infrastructure and services and the perception that the site is relatively isolated. In the Spatial Strategy Paper, the nearby villages of Locking and Hutton are identified as 'Category B' settlements, meaning they are relatively sustainable due to their proximity to Weston-super-Mare, which is a 'higher-order settlement'. Locking also has a range of its own facilities and is within easy reach of wider services located in Weston-super-Mare, making it a more sustainable location for development than many other rural parts of North Somerset. Any future planning application will be required to demonstrate how necessary



			infrastructure and services will be delivered and/or accessed, where appropriate this will be agreed through planning obligations.
		Concern that the development would remove the strategic gaps between Hutton, Elborough and Locking resulting in coalescence, and observations regarding a cumulative loss of open green spaces and undeveloped agricultural land which will harm the rural character of the area. **(A Shipton, Isabelle Lemoille, Jules Turnbull, Janette Baker, Mark Jaloszynski, N Manville, Neil Archibald, Ruth Musandu, Roger Nicholson, Nick Siangolis, Sheila Rhodes, Nick Bowler)**	Locking and Hutton will continue to have tightly drawn settlement boundaries, and most of the valley of the Hutton and Locking Rhyne will remain undeveloped, providing a clear open gap between Elborough and Locking. This will help ensure the landscape remains rural in character and that settlement separation is maintained.
		Concerns raised about disturbance and disruption to the lives of local residents while the new housing development is under construction, including noise, light pollution, HGV traffic, and mud on roads from construction vehicles for years to come. **(Nicola Payne)**	Details about how construction will be managed (e.g. site access points, safety, delivery routes and times) will be addressed at the planning application stage through the submission of a Construction Management Plan (CMP). If any future application gets approval, then there will also be conditions attached which minimise the impacts of construction on local residents and ensures construction does not negatively affect



			residential amenity.
		Concern that the scheme is only being allocated for funding to upgrade the Banwell Road junction with the A371. It is felt that this funding should be secured through existing developments at Locking/Banwell. **(Robert Smart)**	North Somerset Council is expecting all housing allocations within the vicinity of the A371 that will have an impact on the Banwell Road junction, to provide planning contributions towards its upgrade which is proportionate to the impact the development will have on the junction. This includes other developments, such as the adjacent site - Land north of Banwell Road Locking/Elborough.
		Observations from the developer that the site may be able to accommodate more than 70 dwellings depending on masterplanning work. Given the lack of constraints delivery is likely early within the plan period. **(BJ Stephens and Sons/Oneleven Property)**	Noted.
		Development must be designed to reduce the impact of flooding on the proposed development both today and with climate change. Development should align with NSC Level 1 2025 Strategic Flood Risk Assessment (SFRA). Any works taking place within 8m of Main River (fluvial)/ 16m (Tidal) may require a Flood Risk Activity Permit	The Environment Agency's comments are noted. Flood risk is a key consideration for this site and will need to be addressed in accordance with the NSC Level 1 Strategic Flood Risk Assessment (2025) and relevant national policy.



		(FRAP) from the Environment Agency. **(Environment Agency)**	A Flood Risk Assessment will be required from the applicant to demonstrate that the development is safe for its lifetime, takes account of climate change allowances, and does not increase flood risk elsewhere.
Land north of Banwell Road, Locking/Elborough	31	Concerns about increased traffic congestion, air pollution and road safety issues in the area, including at the Banwell Road/A371 junction, through Elborough, Locking and Hutton villages, Old Banwell Road, Banwell Road, The Bury, Locking Moor Road, Hutton Moor Roundabout and J21 of the M5 with necessary improvements/mitigation measures like traffic calming/junction improvements not yet detailed or funded secured through enforceable mechanisms (e.g. S106). Suggestion that there has not been comprehensive transport modelling or clear cross-boundary approach to assess the wider transport impacts. **(Andi Parsons, E Jackson, I Brester Malykh, Isabelle Lemoille, Jules Turnbull, Janette Baker, Mark Jaloszynski, Michelle Parsons, Mrs Sommers, Nick Siangolis, Nicola Payne, Paul Taylor, R Harris, Ruth Musandu, Robert Smart, Spencer Buck, Sheila**	We note the concerns raised regarding potential congestion and road safety issues on the highway network surrounding the site. The Local Plan is supported by robust transport evidence and an Infrastructure Delivery Plan (IDP), which identifies a package of improvements required to mitigate cumulative impacts. Any future planning applications will also need to provide detailed transport assessments addressing their own, as well as cumulative, impacts and demonstrating safe and appropriate mitigation.



		Rhodes, Paul Turner)	
		Lack of public transport/active travel options and infrastructure to support the level of growth proposed, which would result in increased car dependency. Limited bus services within walking distance in Elborough/Hutton and no train station nearby. Bus improvements should be funded and secured, not just aspirational and to be delivered alongside housing completion. No safe walking or safe cycling routes for children or adults to and from the current Parish facilities situated in the village of Hutton - including School, Village Hall, Scout Hut, Children's Play Area, Adventure Play Area, Hutton Football Club and local businesses. **(Andi Parsons, I Brester Malykh, Isabelle Lemoille, Jules Turnbull, Janette Baker, Michelle Parsons, Mrs Sommers, Neil Archibald, Spencer Buck, Sheila Rhodes, Hutton Parish Council, Nick Bowler)**	These matters have been considered at a high level through the plan-making process and will be addressed in more detail at the planning application stage. The Plan recognises the need to improve sustainable transport options to support proposed growth. As such, one of the site specific requirements for a future planning application must demonstrate joined-up, safe and convenient active travel connections, linking this site and the allocation Land to the West of Elborough with Locking Parklands and the A371 strategic cycleway. Applications will be expected to be supported by proportionate transport assessments and active travel strategies, identifying how safe walking and cycling routes can connect residents to local facilities, services and schools.



			The Council also acknowledges concerns regarding limited bus provision. Any necessary improvements to public transport services or supporting infrastructure will be considered through the development management process and, where justified, will be secured through planning obligations such as S106 agreements.
		Flood risk concerns, especially around drainage and surface water flooding caused by impermeable surfaces of the new development. There are existing surface water problems in and around the area of the development especially after heavy rainfall. Banwell Road is often mentioned as a flooding hotspot, particularly the area by the pond. Request a site-specific surface-water management strategy (e.g. water attenuation measures). **(Andi Parsons, E Jackson, I Brester Malykh, Jules Turnbull, K Humphries, Mark Jaloszynski, Michelle Parsons, Mrs Sommers, Nick Siangolis, Nicola Payne, Paul Taylor, R Harris, Ruth, Spencer Buck, Sheila Rhodes, Paul Turner, Nick Bowler)**	Flood risk is a key consideration for this site and will need to be addressed through a site-specific Flood Risk Assessment and surface water management strategy submitted during the planning application stage. This would be required to demonstrate how surface water runoff will be managed through appropriate measures such as attenuation ponds and sustainable drainage systems (SuDS). Development will be expected to ensure that flood risk is not increased on-site or elsewhere, taking account of future climate change scenarios, and that proximity of housing with flood zones is appropriately mitigated.

		Infrastructure capacity and public service provision cannot support this level of growth (disproportionate) and there is a lack of detail about potential upgrades. Lack of facilities and amenities such as shops and schools. Combined with other allocated sites nearby, there is too much development planned in the area. People will inevitably have to drive to access public services, as not within walking distance. Development should be closer to areas with more community infrastructure/provisions. Suggestion made that development should be prioritised closer to areas with existing community infrastructure/services and better transport connections – e.g. Locking Parklands, Banwell, Weston-super-Mare. **(Andi Parsons, Isabelle Lemoille, Jules Turnbull, Janette Baker, Michelle Parsons, Mrs Sommers, N Manville, Neil Archibald, Nick Siangolis, Nicola Payne, Paul Taylor, R Harris, Ruth Musandu, Spencer Buck, Sheila Rhodes, Nick Bowler)**	The scale and distribution of housing allocations have been informed by the Council's evidence base, including the Local Housing Need Assessment and the Spatial Strategy, Site Selection and Capacity work, which demonstrate that growth must be directed across a range of locations to meet identified housing needs and demographic change, rather than being focused solely in larger urban centres. Infrastructure capacity and service impacts are recognised and will be addressed through the planning application process, supported by appropriate technical evidence. Where development gives rise to additional demands on education, community facilities, transport or other services, these impacts will be mitigated through planning obligations, ensuring that necessary upgrades or contributions are delivered alongside development. Specific site requirements stated in Schedule 1 also seek to improve sustainable and active travel



			connections, reducing reliance on private car use and improving public transport links to nearby settlements and services.
		Concerns regarding a negative ecological impact if this development were to proceed on existing wildlife habitats and protected species. Site is a popular bird nesting spot, and it also falls within the North Somerset Bat Special Area of Conservation (SAC). Request thorough ecological assessments are carried out including bat surveys. Request biodiversity net gain (BNG) enhancements and a habitat connection strategy. **(Andi Parsons, E Jackson, I Brester Malykh, Isabelle Lemoille, K Humphries, Michelle Parsons, Mrs Sommers, Neil Archibald, Nick Siangolis, Nicola Payne, R Harris, Sarah H, Sheila Rhodes, Nick Bowler)**	The concerns raised regarding potential impacts on biodiversity, protected species and habitat connectivity are noted. Environmental considerations are a key requirement of the Plan and will be addressed in more detail at the planning application stage. Any proposal coming forward will need to be supported by appropriate ecological assessments, having regard to the site's location within the North Somerset and Mendips Bat Special Area of Conservation (SAC). Planning applications will be expected to demonstrate that impacts on designated sites, wildlife habitats and corridors are avoided or adequately mitigated, and that there is no adverse effect on the integrity of the SAC. Engagement with relevant statutory consultees, including Natural England, will

			form part of this process. In addition, development will be required to deliver measurable Biodiversity Net Gain either through on-site and/or off-site enhancements.
		Concern about the cumulative loss of green open space to development in the area – already lots of housing being built in the vicinity of the site e.g. Locking Parklands. Concern that this constitutes disproportionate development that will harm the character of the rural village and its setting in the open countryside. Important agricultural land will be lost in the process. Concern that the development would remove the strategic gaps between Hutton, Elborough and Locking resulting in future coalescence. **(Hutton Parish Council, Andi Parsons, E Jackson, I Brester Malykh, Isabelle Lemoille, Jules Turnbull, Janette Baker, K Humphries, Michelle Parsons, Mrs Sommers, Mark Jaloszynski, N Manville, Neil Archibald, Nick Siangolis, Ruth Musandu, Nick Bowler)**	Locking and Hutton will continue to have tightly drawn settlement boundaries, and most of the valley of the Hutton and Locking Rhyne will remain undeveloped, providing a clear open gap between Elborough and Locking. This will help ensure the landscape remains rural in character and that settlement separation is maintained.

		Concerns raised about disturbance and disruption to the lives of local residents while the new housing development is under construction, including noise, light pollution, HGV traffic, and mud on roads from construction vehicles for years to come. **(Nicola Payne)**	Details about how construction will be managed (e.g. site access points, safety, delivery routes and times) will be addressed at the planning application stage through the submission of a Construction Management Plan (CMP). If any future application gets approval, then there will also be conditions attached which minimise the impacts of construction on local residents and ensures construction does not negatively affect residential amenity.
		The developer is in the process of preparing an outline planning application for Land north of Banwell Road, Locking/Elborough. This followed positive pre-application discussions with the Council during the summer 2025. The proposed development will address each of the criteria set out in Schedule 1 of the Plan. They have no objections to the criteria set out. Request for a boundary extension to optimise the site and accommodate additional development up to around 415 homes. **(Mac Mic Strategic Land – Land north of Banwell Road)**	Support noted. The capacity stated in Schedule 1 is indicative and may be refined as masterplanning work progresses.



		Concern from residents regarding the impact of the nearby skatepark on existing and new residential amenity, particularly without noise mitigation measures. **(Spencer Buck)**	This is a matter that will be addressed through a planning application.
Clevedon			
Land off Millcross	3	Request for this site to deliver a mix of housing types and tenures, so it is attractive to anyone at any age. It should also be reasonably priced and affordable to single people. They state that there is plenty of housing for elderly people however there is not enough housing for younger generations. Clevedon needs a viable amount of affordable housing to the younger generation to support the local economy. **(Ben Willis)**	Noted. Housing type and mix policies will apply and be considered in detail at planning application stage.
		Support this site as suitable as it is central to amenities to support the residents who will live there. It has been an eyesore and a wasted opportunity to be developed for too long. **(Angela MacLeod Gibson)**	Agreed.
Land north of	55	Strong local opposition to the site being used for housing and two petitions have generated over 600 signatures.	The Council acknowledges the strong local opposition and the importance of the site to



Churchill Avenue		The community has expressed a consistent wish to see Penny Field protected and enhanced for nature and public benefit. Many residents feel that this site should be protected and designated as a Local Green Space, for wildlife, community wellbeing, nature recovery and access to open space/nature. It is felt that better brownfield sites exist across the town which are more suitable for development. **(A Westaway, Andy Chappel, Anne Morrison, Antony Paynter, Cath Fuidge, Emma, Eve Haines, Gemini, Graham Paul House, H Pullen, Heather, HelenMW, J DeBude, James Cridland, Jim Wakefield, Jo Ryder, Joseph Sawtell, Julia Kennaby, K Chan, Laura Mills, Lilian Harper, Lisa Edwards, Margaret Anne Hughes, Martyn White, Nikki Parsons, P Stefan, Paul Hinkley, Paul Rosser, Richard Clark, Roxanna, Ruth, Ruth Carter, S Knight, C Sansum, Susie Greenup, Zara White, Ms Jones, L Power)**	the community. The principle of allocation on this site has previously been established through the adopted Site Allocations Plan. The site-specific requirements state that part of the site should be given over to improved play or public open space facilities, and that part of the site may be considered suitable for Local Green Space designation in future. It should be noted that other designated Local Green Spaces are available within a short walking distance, including Strode Road Playing Fields and Salthouse Fields Recreation Ground, both within approximately 0.5 miles (around a 10-minute walk).
		Queries have been raised about whether Penny Field is under ownership of North Somerset Council, or whether it belongs to the people of Clevedon, questioning the legality of the proposal. Respondents say the land was entrusted to the Council as a greenspace for the people of Clevedon.	We can confirm that the land is under the ownership of North Somerset Council and there were no stipulations that the site must be retained for this reason.

		(Antony Paynter, Jim Harwood, Martyn White, Roxanna Vennard, Ruth Gofton, Ruth Carter, Stella Payne, Steve Parsons)	
		Localised concerns regarding car parking and congestion in the vicinity of the site. Particular references to construction traffic during any build out. **(Emma, Heather, Paul Rosser, Stella Payne, Vicky Cridland)**	The Council notes concern regarding potential traffic impacts, highway safety, and construction access. Access and transport impacts will be fully assessed at the planning application stage. The applicant will also be required to submit a Construction Management Plan (CMP) to set out how deliveries and construction traffic will be managed whilst minimising impacts on local residents.
		The Environment Agency note that the site is situated within Flood Zone 3 and there is flood risk from the Land Yeo along the western boundary of the site. A buffer strip along the northwestern boundary with the river is suggested. Local residents raise concerns around maintaining access to this stretch of the river for vegetation clearance. **(Environment Agency, Andy Chappel, Eve Haines, Gemini, Heather, L Power, Margaret Anne Hughes, Paul Rosser, Ruth Carter, Stella Payne, Vicky**	The Council notes that the site lies within Flood Zone 3. The applicant will be expected to direct built development away from areas at highest flood risk. This matter will be addressed through a detailed site-specific Flood Risk Assessment demonstrating that the development can be delivered safely without increasing flood risk on and off-site. We anticipate that the applicant will incorporate a buffer strip along the northwestern boundary with the Land Yeo



		Cridland)	during future master planning for the site. This will be something fully considered at the planning application stage.
		It is felt that the benefits of the application are significantly and demonstrably outweighed by the severe cumulative harm it will inflict upon the environment, local infrastructure, character and amenities of the area, which it is felt conflicts with guidance in the NPPF and the current Local Plan. **(Emma, Richard Clark, Ruth Carter, Jim Wakefield)**	The site is allocated in the current local plan. All environmental, infrastructure, and amenity considerations will be carefully assessed against policy guidelines in the NPPF and the adopted Local Plan when a planning application for the site is submitted to ensure any proposals are acceptable in planning terms.
		Concern that the development would place significant pressure on overstretched community services, including GP surgeries and local schools, both of which are currently oversubscribed. There is no clear, funded or deliverable plan for expanding existing facilities or providing new ones to meet the needs of the increased population, raising concerns about service capacity. **(Emma, Richard Clark, Ruth Carter)**	
Great Western Road	4	The Environment Agency notes that the Land Yeo watercourse runs along northern boundary of site and request that a buffer strip should be provided next to	Noted. The applicant will be expected to apply a sequential approach within the site layout, directing built development and more

		watercourse to reduce the flooding risk. **(Environment Agency)**	vulnerable uses away from areas at highest flood risk. This matter will be addressed through a detailed site-specific Flood Risk Assessment demonstrating that the development can be delivered safely without increasing flood risk on and off-site, and appropriate buffers will need to be provided.
		Concern regarding the loss of parking in this location. **(Paul Rosser, Vicky Cridland)**	The principle of locating residential development on this site and the impact of the loss of car parking on the vitality of Clevedon Town Centre has already been assessed through the extant planning permission for the site.
		Concerns regarding this site providing age restricted units. **(Angela MacLeod Gibson)**	The site has extant planning permission which has already established that it is suitable for age-restricted accommodation. This principle of development, including the appropriateness of the housing mix, was fully assessed at the planning application stage.
Castlewood	5	The Environment Agency note that the site is situated within Flood Zone 3 and that the Land Yeo watercourse runs along southern boundary of site. They request that a	The Council notes that the site lies within Flood Zone 3. The applicant will be expected to apply a sequential approach within the site



		buffer strip is provided next to watercourse. **(Environment Agency)**	layout, directing built development and more vulnerable uses away from areas at highest flood risk. This matter will be addressed through a detailed site-specific Flood Risk Assessment demonstrating that the development can be delivered safely without increasing flood risk on and off-site, and appropriate buffers will need to be provided.
		Suggestion that this site could providing housing to support the needs of older people. **(Ben Willis)**	No site specific requirements have been identified at this stage, and an appropriate mix of dwelling types will be expected to be agreed at planning application stage.
		Suggestion that the density on this site should be increased. **(Ian Slatter)**	The capacity cited is indicative.
		This site should be retained for employment use. **(Paul Rosser)**	The Council acknowledges concerns regarding the loss of employment land at Castlewood. However, the Local Plan evidence base, including the Local Housing Need Assessment (2025) and the Spatial



			Strategy Site Selection and Capacity Paper (2025), identifies a significant need for additional housing over the Plan period, and this brownfield site within Clevedon is considered to make an important contribution toward meeting that need.
2-6 Bay Road	0	-	-
Portishead			
Wyndham Way Broad Location	3	This area is in Flood Zones 1, 2 and 3, including a main river. **(Environment Agency)**	Noted. Any flood risk issues will be addressed on a case by case basis through planning applications within this broad location.
		Object to the proposal, on the basis that jobs will be lost and the land is in multiple ownerships and may be difficult to assemble. **(Denise Saunders, C Miles)**	As set out in policy LP20, this is a broad location for growth allocated as a mixed use area to accommodate new town centre uses, new homes and a net increase in jobs. Change in this location is expected to be gradual over the plan period and could take many forms, with land assembly not expected to be an issue.



Petersfield, Church Road South	2	This site includes Flood Zone 2 on eastern edge of site. Sequential approach required for future risk of flooding. **(Environment Agency)**	This site has planning permission and these issues have already been addressed through the application process.
		Support housing in this location. **(Kath Scargill)**	Support welcome.
Downside	5	The site has access issues. **(Glen Davies, E Thompson)**	Site specific requirements state that access is expected to be taken from Downside. Detailed arrangements will need to be identified and agreed through a planning application in future.
		This site should be used for affordable housing on small plots, support the provision of housing to meet the needs of young people. **(Denise Saunders, Kath Scargill)**	Comment noted. The mix and type of dwellings will be determined through a planning application in future.
Land at Tower Farm	245	Significant local opposition to this proposed allocation from local residents. Responses from respondents are largely seeking the allocation to be removed from the plan. The main themes raised throughout the	The scale of objection to this allocation is noted and understood. We have responded to the key themes raised in the objections below.



		representations are listed individually below. **(Note that names of individual respondents have not been listed given the number of objections to this particular allocation. Respondent names, along with the full content of each representation, are listed in the schedules of respondents or available to view on our consultation system)**	
		Significant objections raised in relation to loss of wildlife habitats and potential irreversible damage to the ancient woodland and the subsequent impact on the Gordano Valley Green Corridor SNCI, and Nightingale Valley SSSI. Concerns that no information has been provided about how these impacts will be mitigated in future, or how long-term management will be secured. **(Raised by a significant number of residents, as well as Portishead Town Council)**	The site-specific requirements for this site set out that a suitable ecological buffer must be provided to Weston Big Wood to south of site and future management and maintenance of this area will need to be secured. Further detailed consideration of this matter will take place through any subsequent planning application.
		Significant objection to the site being released from the Green Belt as no exceptional circumstances have been demonstrated to justify this. Concern also raised about the credibility of the Green Belt Review Background Paper, and claims that the site does not meet the definition of grey belt.	Exceptional Circumstances are set out in the Green Belt Background Paper. Two Green Belt assessments have been undertaken which form part of the evidence base for the Local Plan. The Stage 2 Green Belt Assessment concludes that the assessment

			parcel which this site is within makes a weak contribution to Green Belt purposes (a), (b) and (d) and has an overall assessment of weak. As such it can be identified as potential 'grey belt'.
		Significant objection to loss of biodiversity, and disruption to the connected ecosystem. Due to the variety of habitats, there are rare plants, and numerous species, including bats, which will be affected by the proposed allocation as the area comprises open grassland, wetland and woodland. **(Raised by a significant number of residents, as well as Portishead Town Council)**	The HRA concludes that portions of the allocation are of moderate suitability for SAC bats and there is moderate connectivity with roosts in the wider area. Its recommendation is that mitigation may be required which could include buffer zones around the boundary, and that a mitigation plan will be required through a planning application. To secure this, the site-specific requirements for this allocation state: suitable ecological buffer to be provided to Weston Big Wood to south of site and future management and maintenance of this area to be secured.
		Numerous respondents commented on the proposed mix of housing and felt that it was inappropriate to have more family housing as Portishead needs 1-3 bed starter homes and affordable dwellings and downsizer properties for local people, not 4 bed properties. They state that the Housing Needs Assessment for the Portishead	The allocation does not prescribe any particular mix of housing types, this will be a matter that is addressed through a planning application in future.



		Neighbourhood Plan demonstrates this.	
		Various comments received about the delivery of infrastructure, how development on the site is dependent upon it, and how no information has yet been provided about delivery timescales or mechanisms. Future residents will be car dependent if no facilities are provided. Numerous comments were made regarding how insufficient current infrastructure/existing services (such as schools, doctors and dentists, library and other community facilities) are, and how it will be unable to support additional residents within Portishead.	Any particular localised needs arising from development of this particular site will be secured through a legal agreement that accompanies a planning permission in due course. The site specific requirements for this allocation requires education provision in particular, upgrades to public rights of way, active travel connections and contributions to bus service provision. The IDP that accompanies the local plan identifies further infrastructure requirement information with costings, timescales and mechanisms for securing funding.
		Significant objection in terms of traffic impacts, due to concerns over access into and around the site during and after construction, Downs Road is already referred to as congested, the surrounding area is unable to accommodate an increase in traffic, and resultant impacts on highway and pedestrian safety, especially due to the close proximity to the school. Wider traffic impacts may also extend to the M5, and A369 which is already under strain. Other concerns are raised regarding the connectivity of the site to services and facilities in	The Transport Assessment that forms part of the local plan evidence base has considered the cumulative impacts of all proposed allocations across the district. We are aware of localised issues in the vicinity of the school at drop off and pick up time, and this has been raised with the developer of the site as an issue a future planning application must address. M5 J19 is listed in the IDP as a location for future capacity improvements,



		Portishead, with the gradient of the route to the town centre not being suitable for many residents to travel sustainably. **(Raised by a significant number of residents, as well as Portishead Town Council)**	and the plan seeks to secure improved active travel and public transport connectivity to mitigate highway impacts. The site specific requirements set out that contributions will be required to public rights of way, other active travel improvements and improved bus service provision to improve connectivity.
		Significant objections to the lack of consideration for reasonable alternatives (and especially) brownfield sites. Many respondents consider that an increase in density on other sites and the inclusion of Wyndham Way, Cheviot Meadow (and Castlewood in the wider context) especially could make a greater contribution to housing numbers, therefore negating the need for Tower Farm and Black Rock to be developed. Although Wyndham Way has increased in capacity from 485 to 785 homes over previous plan stages there is no evidence that density on other sites has increased. Suggestion that smaller pockets of residential development on the edge of Portishead may be more suitable. Empty properties and former industrial sites should be developed before encroachment on Green Belt.	A sequential approach to identifying suitable locations for development has been undertaken, as demonstrated in the Spatial Strategy, Site Selection and Capacity Paper. Brownfield land has been maximised wherever possible, with Wyndham Way being a good example of this. The plan must contain a range of deliverable sites and broad locations for growth to ensure a sufficient supply of housing over the plan period. The capacities listed for sites are indicative only, and may be refined as planning applications come forward.
		Concerns raised about the loss of an area of green space, as it contributes to the openness of the area. The proposal	We understand these concerns, noting that the site-specific requirements set out that a



		will erode the character of the area.	buffer of green space will be required around Weston Big Wood. Detailed layout arrangements will be a matter to be considered through a planning application in future.
		Objections to the loss of best and most versatile agricultural land and the impact this will have on food security.	The site is classified as Grade 3b in the most recent DEFRA mapping, which is not considered to be best and most versatile agricultural land.
		Some respondents query whether the site is deliverable given the access issues, topographical constraints and infrastructure limitations.	These matters of detail will be worked through as part of detailed considerations during a planning application. The developer has submitted representations to the contrary.
		Concerns raised with regards to flood risk, particularly from rainwater, noting that there are drainage and hydrology issues. Alterations to surface water run off could lead to potential flooding to houses at the bottom of the hill if natural soakaways are concreted over.	This matter will be addressed through a detailed site-specific Flood Risk Assessment demonstrating that the development can be delivered safely without increasing flood risk on and off-site, and any necessary mitigation will need to be provided.
		Concern from local residents that there will be noise and	A construction management plan will be



		other impacts, most particularly during the construction phase.	required with any future planning application to ensure that disturbance is minimised.
		Support for the proposed allocation, on the basis that the site is suitable, available and achievable, noting that the Sustainability Appraisal identifies the site as mostly having minor positive effects. **(Parker Strategic Land)**	Support noted.
		Concern that viability will prevent the delivery of 50% affordable housing and suggestion that this should be 30%. **(Parker Strategic Land)**	Policy DP43 expects developments on land released from the Green Belt to provide 50% affordable housing on site and states that if these requirements cannot be met this will need to be fully justified with clear evidence set out in a viability assessment which must demonstrate that all grant funding sources have been fully explored.
Black Rock, North of Clevedon Road	147	Significant local opposition to this proposed allocation from local residents. Responses from respondents are largely seeking the allocation to be removed from the plan. The main themes raised throughout the representations are listed individually below. **(Note that names of individual respondents have not**	The scale of objection to this allocation is noted and understood. We have responded to the key themes raised in the objections below.



		been listed given the number of objections to this particular allocation. Respondent names, along with the full content of each representation, are listed in the schedules of respondents or available to view on our consultation system)	
		Significant objection to the site being released from the Green Belt as no exceptional circumstances have been demonstrated to justify this. Concern also raised about the credibility of the Green Belt Review Background Paper and claims that the site does not meet the definition of grey belt.	Exceptional Circumstances are set out in the Green Belt Background Paper. Two Green Belt assessments have been undertaken which form part of the evidence base for the Local Plan. The Stage 2 Green Belt Assessment concludes that the assessment parcel which this site is within makes a weak contribution to Green Belt purposes (a), (b) and (d) and has an overall assessment of weak. As such it can be identified as potential 'grey belt'.
		Significant objections raised in relation to loss of wildlife habitats and potential irreversible damage to Weston Big Wood SNCI. Concerns that no information has been provided about how these impacts will be mitigated in future, or how long-term management will be secured. Residents are concerned that there will be increased footfall through the wood as a result of development and	The site-specific requirements for this site set out that a suitable ecological buffer must be provided to Weston Big Wood to south of site and future management and maintenance of this area will need to be secured. Further detailed consideration of this matter will take place through any subsequent planning



		that this could cause irreversible damage. **(Raised by a significant number of residents, as well as Portishead Town Council)**	application.
		Significant objection to loss of biodiversity, and disruption to the connected ecosystem. Due to the variety of habitats, there are rare plants, and numerous species, including bats, which will be affected by the proposed allocation as the area comprises open grassland, wetland and woodland. **(Raised by a significant number of residents, as well as Portishead Town Council)**	The HRA concludes that the allocation is of low suitability for SAC bats and has low-moderate connectivity with roosts in the wider area. Its recommendation is that site surveys will be required at planning application stage to confirm this. The site-specific requirements require environmental and ecological mitigations, and also state: suitable ecological buffer required along northern extent of site and future management and maintenance of this area to be secured.
		Objections to the loss of best and most versatile agricultural land and the impact this will have on food security.	The site is classified as Grade 3b in the most recent DEFRA mapping, which is not considered to be best and most versatile agricultural land.
		Observations that the scheme will generate additional transport movements in what is reported to be an already congested area, as well as wider impacts for example M5 Junction 19 and along the B3124. Concerns raised	The Transport Assessment that forms part of the local plan evidence base has considered the cumulative impacts of all proposed allocations across the district. M5 J19 is listed



		regarding car dependency, due to the location of the site and as services and the train station are not within easy walking distance. There is a lack of public transport, and walking or cycling to key amenities is impractical.	in the IDP as a location for future capacity improvements, and the plan seeks to secure improved active travel and public transport connectivity to mitigate highway impacts. The site-specific requirements set out that a footway must be provided along the northern side of Clevedon Road and a crossing point on the other side delivered. Connections are also required through the site to the adjacent wider footway and cycle network, along with a contribution tom, or delivery of, a section of Gordano Greenway. Furthermore, contributions are required towards bus stops.
		Local community facilities are already overstretched and cannot support additional growth. Local schools will be oversubscribed. Concern that new services cannot be delivered.	The site-specific requirements seek a proportionate contribution to education provision in Portishead.
		Significant objections to the lack of consideration for reasonable alternatives (and especially) brownfield sites. Many respondents consider that an increase in density on other sites and the inclusion of Wyndham Way, Cheviot Meadow (and Castlewood in the wider context) especially could make a greater contribution to housing numbers, therefore negating the need for Tower Farm and Black	A sequential approach to identifying suitable locations for development has been undertaken, as demonstrated in the Spatial Strategy, Site Selection and Capacity Paper. Brownfield land has been maximised wherever possible, with Wyndham Way being a good example of this. The plan must



		Rock to be developed. Although Wyndham Way has increased in capacity from 485 to 785 homes over previous plan stages there is no evidence that density on other sites has increased. Suggestion that smaller pockets of residential development on the edge of Portishead may be more suitable. Empty properties and former industrial sites should be developed before encroachment on Green Belt.	contain a range of deliverable sites and broad locations for growth to ensure a sufficient supply of housing over the plan period. The capacities listed for sites are indicative only and may be refined as planning applications come forward.
		Concerns raised with regards to surface water flood risk as the site is reported to often be waterlogged. Observation from the Environment Agency that the site includes flood zone 2 and 3 opposite Clevedon Road (outside of the site allocation), and a sequential approach should be taken.	This matter will be addressed through a detailed site-specific Flood Risk Assessment demonstrating that the development can be delivered safely without increasing flood risk on and off-site, and any necessary mitigation will need to be provided.
		Concern from local residents that there will be noise and other impacts, most particularly during the construction phase.	A construction management plan will be required with any future planning application to ensure that disturbance is minimised.
		Concerns raised about the loss of an area of green space, as it contributes to the openness of the area. The proposal will erode the character of the area.	We understand these concerns, noting that the site specific requirements set out that a buffer of green space will be required around Weston Big Wood. Detailed layout arrangements will be a matter to be



			considered through a planning application in future.
		Weston Big Wood is one of the most important biodiversity sites in North Somerset, the ancient woodlands are now fragile and cannot be restored once damaged. The SSSI is currently in unfavourable declining condition due to the level of footfall, with biodiversity declining, degrading it further could have a negative impact on wildlife, flora and ecology of the whole Gordano Valley. The Wood requires a substantial buffer zone. **(Avon Wildlife Trust)**	Concerns noted. The site-specific requirements for this site set out that a suitable ecological buffer must be provided to Weston Big Wood to south of site and future management and maintenance of this area will need to be secured. Further detailed consideration of this matter will take place through any subsequent planning application.
		The site is available, suitable, achievable and supported by comprehensive technical evidence. **(Aston & Co)**	Noted.
		Whilst the allocation is supported the landowner and the promotor, they request an extension to the boundary of the site as proposed, and the entirety of SHLAA site HE20124 to be released from the Green Belt on the basis they consider it constitutes grey belt. **(Aston & Co, Bloor Homes)**	We understand that the landholding extends to the west, beyond the boundary of the allocation as proposed. The site identified is based upon information submitted by the landowner during the Additional Sites Consultation last year, as they were not proposing any built form on the western parcel at that time, just environmental and ecological mitigation, which is reflected in the

			site specific requirements.
		Development of this site will bring distinctive benefits, including delivery of part of the Gordano Greenway Cycle Link and wider accessibility improvements, protection and enhancement of the Weston Big Wood SSSI and provision of high quality public open space. **(Bloor Homes)**	Noted. It is expected that these mitigations and benefits will be secured through a future planning application.
VILLAGES			
Banwell			
Land south of Knightcott Gardens	0	-	-
Bleadon			
Bleadon Quarry	1	This site includes Flood Zone 2 along the eastern boundary. **(Environment Agency)**	This site has planning permission and is under construction.
Churchill			



Land east of Ladymead Lane	2	The Parish Council is concerned about the cumulative impact of several housing schemes in the vicinity of this site and how they will impact traffic and road safety in the area. They request a comprehensive review of road safety for active travel to/from the schools and for road safety measures to be implemented before any further housing development occurs at these locations. **(Churchill Parish Council)**	The concerns raised by the Parish Council regarding cumulative traffic impacts and road safety issues are noted. Future planning applications will be required to provide appropriate mitigations and contributions towards active travel improvements within the area, included enhanced and safer walking and cycling connections.
		The developer of the site requests a boundary change to combine this site with proposed adjoining allocation 'land south of Jubilee Lane' in line with a submitted planning application. **(Rubix Land)**	Should the planning application be considered favourably the boundary change, and any associated capacity changes, can be captured at that time.
Land north of Pudding Pie Lane	1	The Parish Council is concerned about the cumulative impact of several housing schemes in the vicinity of this site and how they will impact traffic and road safety in the area. They request a comprehensive review of road safety for active travel to/from the schools and for road safety measures to be implemented before any further housing development occurs at these locations. **(Churchill Parish Council)**	The concerns raised by the Parish Council regarding cumulative traffic impacts and road safety issues are noted. Future planning applications will be required to provide appropriate mitigations and contributions towards active travel improvements within the area, included enhanced and safer walking and cycling connections.



Pudding Pie Lane (West)	1	The Parish Council is concerned about the cumulative impact of several housing schemes in the vicinity of this site and how they will impact traffic and road safety in the area. They request a comprehensive review of road safety for active travel to/from the schools and for road safety measures to be implemented before any further housing development occurs at these locations. **(Churchill Parish Council)**	The concerns raised by the Parish Council regarding cumulative traffic impacts and road safety issues are noted. Future planning applications will be required to provide appropriate mitigations and contributions towards active travel improvements within the area, included enhanced and safer walking and cycling connections.
Land south of Jubilee Lane	1	The Parish Council is concerned about the cumulative impact of several housing schemes in the vicinity of this site and how they will impact traffic and road safety in the area. They request a comprehensive review of road safety for active travel to/from the schools and for road safety measures to be implemented before any further housing development occurs at these locations. **(Churchill Parish Council)**	The concerns raised by the Parish Council regarding cumulative traffic impacts and road safety issues are noted. Future planning applications will be required to provide appropriate mitigations and contributions towards active travel improvements within the area, included enhanced and safer walking and cycling connections.
Land south of Bristol Road and north of Bath Road	0	-	-
Land at Dinghurst	0	-	-



Road			
Land at Hilliers Lane	0	-	-
Congresbury			
Woodhill Nurseries	5	Concern regarding impact on the protected species of horseshoe bats and their priority habitats. **(Mrs Mary Theresa Kingston, Adrian Mealing)**	The HRA (2025) which forms part of the Council's evidence base conducted a high-level assessment of the site on the impact of the SAC and this concluded that the "0.9 ha allocation has no suitability for SAC bats". It also said, "the allocation has no connectivity with known roosts in the wider area" and therefore "it is likely that the allocation would not make a material impact upon functionally linked land at a strategic level for the SAC". However, individual site surveys will be expected when the applicant submits a full planning application to confirm there are no specific bat roosts/activity present on the site.
		Concern is raised that due to the site's position on the edge of Congresbury, development here will erode the	As this site is situated within the settlement boundary of Congresbury and is surrounded



		rural character of the area and create urban sprawl. There is also concern that it will negatively impact the heritage asset of Cadbury Hill Fort and its wider setting. **(Adrian Mealing, Mrs Mary Theresa Kingston, Historic England)**	by industrial/commercial uses, it is felt that this parcel of land does not contribute strongly to the rural character of the area. It is also bordered by the A370 to the south and Wood Hill to the north, which serve as barriers that help to contain the site. When a planning application is submitted, the developer will be expected to create a layout and design for the site which is sympathetic with the local character of the village, and they will need to carefully consider issues including the visual impact on the landscape and local heritage assets. One of the site requirements expects the setting of Cadbury Hill Fort scheduled monument to be carefully considered in the planning application and appropriate mitigations agreed. This matter is covered in the statement of common ground with Historic England.
		Query regarding how local facilities and services will be able to support the population increase from the development (e.g. school places, doctors, community facilities, highway network).	The Council recognises the importance of ensuring that new development is supported by appropriate infrastructure. It is considered that the relatively modest scale of growth proposed in Congresbury can be



		(Adrian Mealing)	accommodated.
		Support for the allocation from the developer. **(M7 Planning Ltd)**	Support noted.
Land south of Station Road	2	The Environment Agency says that areas along the southern boundary of site fall within Flood Zones 2 and 3, so a sequential approach should be applied, considering the future risk of flooding. **(Environment Agency)**	Noted. The applicant will be expected to apply a sequential approach within the site layout, directing built development and more vulnerable uses away from areas at highest flood risk. This matter will be addressed through a detailed site-specific Flood Risk Assessment demonstrating that the development can be delivered safely without increasing flood risk on or off-site.
		General objection to the site being allocated for a number of reasons. **(Adrian Mealing)**	This site has planning permission and the matters raised have been considered through the planning application process.
Pineapple Farm, Land north of Mulberry Road	2	The Environment Agency notes that the site is situated within Flood Zone 1 and the northeast corner of site is in Flood Zone 3. **(Environment Agency)**	Noted. This matter was considered through the planning application process before consent was granted.



		General objection to the site being allocated for a number of reasons. **(Adrian Mealing)**	This site has planning permission and the matters raised have been considered through the planning application process.
Long Ashton			
Unit C, Estune Business Park	0	-	-
Unit A, Estune Business Park	0	-	-
Sandford			
Land at Mead Farm	1	Concern has been raised about the access to the site from Mead Lane which they feel is inappropriate and will result in unsustainable development. **(Paul Watkins)**	This site has planning permission and the matters raised have been considered through the planning application process.
Land south of Greenhill Road	1	There is concern that the site constitutes unsustainable development and has not been properly considered by the Council.	This site has planning permission and the matters raised have been considered through the planning application process.



		(Paul Watkins)	
Winscombe			
Woodborough Farm	1	It is felt that this site does not meet the criteria for sustainable development and conflicts with national planning guidance. **(Paul Watkins)**	This site has planning permission and the matters raised have been considered through the planning application process.
Broadleaze Farm	2	The Environment Agency notes that the site includes areas of Flood Zone 3 via an ordinary watercourse in the centre of the site. **(Environment Agency)**	Noted. The applicant will be expected to apply a sequential approach within the site layout, directing built development and more vulnerable uses away from areas at highest flood risk. This matter will be addressed through a detailed site-specific Flood Risk Assessment demonstrating that the development can be delivered safely without increasing flood risk elsewhere.
		Concern raised that this site does not constitute sustainable development and has not been thoroughly considered. **(Paul Watkins)**	The Council does not agree that the site represents unsustainable development or that it has not been properly considered. The proposal is an extant allocation that has been carried forward, and re-assessed within the context of the emerging spatial strategy,



			informed by the Spatial Strategy, Site Selection and Capacity Paper and the Strategic Housing Land Availability Assessment (SHLAA).
West of Hill Road	1	Concern raised that this site does not constitute sustainable development and has not been thoroughly considered. **(Paul Watkins)**	The Council does not agree that the site represents unsustainable development or that it has not been properly considered. The site has been assessed within the context of the emerging spatial strategy, informed by the Spatial Strategy, Site Selection and Capacity Paper and the Strategic Housing Land Availability Assessment (SHLAA).
Land at Combe Farm and Shipham Lane	2	The Environment Agency notes that the site includes areas of Flood Zone 3 via an ordinary watercourse in the centre of the site. They say a sequential approach should be applied on site, taking into account future risk of flooding. They note this has been stated within the site requirements. **(Environment Agency)**	Noted. This matter was addressed through the planning application for the consented scheme.
		Query why the site status says resolution to grant consent.	The status of each site listed relates to the base date of April 2025. The site had a resolution to grant permission at that time,



		(Paul Watkins)	and consent has since been granted.
Former Mooseheart Lodge	0	-	-
Yatton/Claverham			
Moor Road, Yatton	1	The Environment Agency notes that this site includes areas of Flood Zones 2 and 3 along its north eastern boundary. They say a sequential approach should be applied on site, taking into account future risk of flooding. **(Environment Agency)**	Noted. This matter was addressed through the planning application for the consented scheme.
North Field Claverham Works, Claverham	1	The Environment Agency states that this site is in Flood Zone 1 with an ordinary watercourse along the southern boundary of the site. **(Environment Agency)**	Noted. This site has consent.
Rectory Farm, Yatton	1	The Environment Agency says this site is mostly Flood Zone 1 but surrounded by Flood Zones 2 and 3 along the boundaries. They say a sequential approach should be done which considers the future risk of flooding. **(Environment Agency)**	Noted. This matter was addressed through the planning application for the consented scheme.



Oxford Plasma, Yatton	2	The Environment Agency says this site includes areas of Flood Zones 2 and 3 along the southern boundary. A sequential approach should be applied on site, considering future risk of flooding. **(Environment Agency)**	Noted, this will be considered through the planning application process.
		The developer supports the allocation and states that the proposed scheme will deliver 58 dwellings, now confirmed as 100% affordable housing through partnership with Alliance Homes, which responds to acute local need and is supported by grant funding. They say this exceeds policy requirements and contributes significantly to meeting housing targets in North Somerset. **(Woodstock Homes Ltd)**	Noted.
Yatton Rugby Football Club, North End Road, Yatton	1	The Environment Agency says this site includes Flood Zones 2 and 3 along the north eastern boundary. Sequential approach should be applied on site, taking into account future risk of flooding. **(Environment Agency)**	Noted. This matter was addressed through the planning application for the consented scheme.
Other settlements and countryside locations			



Barrow Hospital (1), Barrow Gurney	1	Concern has been raised about the loss of Green Belt land which will have a detrimental impact on local wildlife and habitats, including the ancient woodland surrounding the site. **(Mr D Wheeler)**	These matters were considered through the planning application process. The site now has consent and is under construction.
Barrow Hospital (2), Barrow Gurney	0	-	-
Land north of Colliter's Way	6	Concern has been raised about the impact of this development on local biodiversity and wildlife habitats. **(Avon Wildlife Trust, Mr D Wheeler)**	The Council recognises the site's relationship to nearby protected habitats and wildlife corridors. A high-level Habitat Regulations Assessment (HRA), undertaken as part of the evidence base, has considered the potential effects on the North Somerset and Mendips Bat SAC. This found that parts of the site have higher suitability and moderate connectivity for SAC bats, and therefore ''there is the potential to have an adverse impact on functionally linked land for the SAC through removal or disturbance to valuable features'' which is why existing trees, hedgerows and historic field patterns will be expected to be retained and integrated into



			the design. However, the HRA also identifies that mitigation measures—such as buffer zones and habitat offsetting—can be secured through a site-specific mitigation plan at the planning application stage.
		The Environment Agency notes that this site is Flood Zone 1 and comments related to the nearby strategic allocation at Woodspring may be relevant. **(Environment Agency)**	Noted.
		Concern has been raised that this allocation ignores policy guidance and law on Green Belt protection. **(Mr D Wheeler)**	The Strategic Green Belt Assessment considered this parcel against the purposes of the Green Belt. It concluded that the site makes an overall weak contribution to the Green Belt, with only a moderate contribution to ‘’safeguarding the countryside from encroachment’’, therefore it is felt this site meets national policy and guidance regarding Green Belt release.
		Support for the allocation from the developer, and from Taylor Wimpey who are the developer for the neighbouring plot of land at Land West of Elsbert Drive, Bristol, who agree that exceptional circumstances exist to	Support noted, and both NSC and BCC are committed to ensuring cross-boundary working in respect of these sites either side of their administrative boundaries. Access



		merit Green Belt release as it makes limited contribution to the purposes of the Green Belt and is in a highly sustainable and accessible location. Both parties refer to cross-boundary working. The developer (Barratt Homes – Bristol) questions the site requirement that there shall be no vehicular access off Colliters Way. Taylor Wimpey (the developer of neighbouring site – Elsbert Drive) agree with preventing vehicular access of Colliter's Way. The Wring Family Trust supports the intention of North Somerset Council to prevent vehicular access from Colliter's Way although would like vehicular access to be permitted from A38 Bridgwater Road as they think access from Elsbert Drive is unsuitable for the entire allocation. **(Barratt Bristol, Taylor Wimpey, Wring Family Trust)**	arrangements will be considered through detailed planning applications.
Gatcombe Farm, Wrington	1	It is felt that this development will result in more private car use due to its isolated location outside of the village settlement boundary. There is inadequate public transport to essential services from the site and the development should carefully consider pedestrian access and the impact of extra traffic on the surrounding rural road network which is narrow. **(David Glynn)**	These matters were considered through the planning application process. The site now has consent and is under construction.
Land at Blagdon Water Garden	1	The Environment Agency says this site includes areas of Flood Zone 3 via an ordinary watercourse in the eastern	These matters were considered through the

Centre, Langford		part of the site. A sequential approach should be applied on site, taking into account future risk of flooding. **(Environment Agency)**	planning application process.
Cambridge Batch Garage, Weston Road, Long Ashton	0	-	-
The Inn at Yanley	1	The Environment Agency stated that they could not locate the site on the Policies Map. **(Environment Agency)**	We can confirm that the site is identified on the policies map, although surrounded by the proposed Woodspring development which may have made it difficult to identify. In any event, the site has recently secured planning permission.
Monaghan Mushrooms, Stock Lane, Langford	0	-	-
Monaghan Mushrooms Broad Location	0	-	-



Schedule 2: Employment sites

Site name	Number of representations received	Main issues raised	Officer response
Weston-super-Mare			
Haywood Village Business Quarter	1	Note the site's location within flood zone 3. **(Environment Agency)**	This site already benefits from planning consent as part of the wider committed Weston Villages regeneration site. This development was supported by strategic investment into a flood strategy and mitigation work for the entire site.
Parklands, Grumblepill	1	Note the site's location within flood zone 3. **(Environment Agency)**	This site already benefits from planning consent as part of the wider committed Weston Villages regeneration site. This development was supported by strategic investment into a flood strategy and mitigation work for the entire site.
Parklands, land off	1	Clarification sought on the request for additional tree	Comments noted. Agreed that this will be



Cruikshank Grove		planting in the surrounding landscape on the basis this falls outside of this allocation and will be picked up in the wider Locking Parklands landscape strategy. **(Homes England)**	picked up as part of the wider Locking Parklands landscape strategy.
		Homes England supports the allocation of these 2 sites for employment uses at Locking Parklands. This ensures that employment opportunities are provided in step with housing growth and to strengthen and reinforce Weston-super-Mare as a principal economic centre.	Support welcomed.
Parklands, land off Mccrae Road	0	-	-
Parklands, West Wick roundabout	1	Note the site's location within flood zone 3. **(Environment Agency)**	Noted. The Weston Villages development area was supported by strategic investment into a flood strategy and mitigation work for the entire site.
West Wick Business Park	1	Site includes land in flood zone 2 and 3. **(Environment Agency)**	Noted. The site has planning permission.
Summer Lane, north	1	Site includes land in flood zone 3.	Noted. The site has planning permission.



of A370		**(Environment Agency)**	
Moor Park, A371	0	-	-
Other towns			
Land west of Kenn Road, Clevedon	2	Site includes land in flood zone 3. **(Environment Agency)**	Noted, this site has been subject to sequential testing as part of the emerging local plan, and has recently secured outline planning permission.
		Query over location, stating that the allocation is in Kenn parish, not Clevedon, and potential duplicate site entry in SA. **(Kenn Parish Council)**	The parish boundary is noted, however in functional terms, the site is well-related to Clevedon and recorded as such. The site is listed twice in the SA, having been considered for both housing and employment potential.
Gordano Gate, Portishead	1	This site includes Flood Zone 2 and 3. Portbury Ditch runs along the north western boundary of the site. **(Environment Agency)**	This site has been subject to sequential testing as part of the emerging local plan. At the planning application stage, measures will be required to ensure safety of development via a flood risk assessment, noting the lower vulnerability of commercial development compared for example, to residential.



